

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

**Agents and  
Developers -  
Part 3**

**3 February - 21 April 2020**

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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>	<b>Mr</b>	<b>Mr</b>
<b>First Name</b>	<b>Chris</b>	<b>Mike</b>
<b>Surname</b>	<b>Shaw</b>	<b>Taylor</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		
<b>Organisation (if applicable)</b>		<b>Barbers Rural</b>
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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](mailto: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-](http://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 However, your contact details will not be published.

<b>Part B: Your Comments</b>				
<i>Please complete a new Part B for each representation you wish to make.</i>				
<b>Name</b> M Taylor		<b>Organisation</b> Barbers Rural		
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>		<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>We are supportive of the Council’s plan especially in relation to new and garden settlements, although we feel the plan may require more rigour.</p>				

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>		<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>We are supportive of the Council’s plan especially in relation to new garden settlements.</p>				

***Please use a continuation sheet if necessary***

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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](http://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](mailto:forwardplanningconsultations@staffordbc.gov.uk)

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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>	<b>Mr</b>	<b>Mr</b>
<b>First Name</b>	<b>Joe</b>	<b>James</b>
<b>Surname</b>	<b>Ledwidge</b>	<b>Bonner</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>	<b>Finance Director</b>	<b>Associate Planner</b>
<b>Organisation (if applicable)</b>	<b>Morgan Sindall</b>	<b>Barton Willmore</b>
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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.

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- 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.

<b>Part B: Your Comments</b>				
<i>Please complete a new Part B for each representation you wish to make.</i>				
<b>Name: James Bonner</b>		<b>Organisation: Barton Willmore obo Morgan Sindall</b>		
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>		<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>Please see the enclosed covering letter which responds to the following questions:</p> <p><u>Question 3.A – Do you agree that the Vision should change?</u></p> <p><u>Question 5.B – a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough’s future housing growth requirements? b) Should a Partial Catch Up rate allowance be incorporated?</u></p> <p><u>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?</u></p> <p><u>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?</u></p> <p><u>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?</u></p> <p><u>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? Please explain your answer.</u></p> <p><u>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?</u></p>				

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

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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**

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Planning (Development Management)  
Stafford Borough Council  
Riverside  
Civic Centre  
Stafford  
ST16 3AQ

**VIA EMAIL: [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)**

28854/A3/LS/IG/JB/bc

21 April 2020

Dear Sir/Madam,

**REPRESENTATIONS ON BEHALF OF MORGAN SINDALL CONSTRUCTION & INFRASTRUCTURE LTD**  
**STAFFORD BOROUGH LOCAL PLAN 2020 – 2040 ISSUES AND OPTIONS**

On behalf of our Client, Morgan Sindall Construction & Infrastructure Ltd, we write in response to the Stafford Borough Local Plan 2020 – 2040 Issues and Options Consultation (and addendum) which was originally proposed to run from 3rd February – 31st March 2020 but has since been extended to 21st April 2020.

The Consultation invites comments on a range of issues facing Stafford Borough and how, through a new strategic policy framework, they might be addressed. Included are the levels of housing and employment development the Borough requires over the next 20 years, and how this provision may be distributed. The options include the potential for one or more new garden communities / major urban extensions to be delivered. The viability of delivering a new Garden Community is addressed within the Issues and Options Consultation Document and its supporting evidence base.

Our Client has land interests at the Magnor Plant depot, which due to relocation, will soon be vacant. It is shown as being within the proposed Meecebrook new garden settlement, which is identified as a potential option to deliver housing and employment growth within and beyond Stafford's emerging plan period. This response therefore supports the option for delivering a Garden Community at Meecebrook.

This submission is also accompanied by a Call for Sites form and Site Location Plan identifying our Client's land interests and is accordingly submitted to the Council's ongoing 'Call for Sites' process which we understand remains open as part the preparation of the Strategic Housing and Economic Land Availability Assessment (SHELAA) to inform the new Local Plan. This demonstrates the availability of the land for inclusion in the potential new settlement.



### **Section 3 – Vision and Strategic Objectives**

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

We are supportive of the draft vision and strategic objectives originally consulted on within the 'Scoping the Issues Consultation' Draft of the Local Plan (July – September 2018) and reiterated in the Issues and Options Consultation Document. The objectives set out within the Consultation Document relate to design quality, tourism and town centre uses, climate change and global warming, renewable energy and technological advancement. Although we are in agreement with these themes, it is also worth noting the importance of delivering sustainable communities and the fundamental role that delivering a range of housing types and tenures within those communities will have; the vision should reflect that importance. It will also need to be updated to reflect the Garden Settlement, should this become the preferred option.

### **Section 5 – The Development Strategy**

#### Question 5.B – a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? b) Should a Partial Catch Up rate allowance be incorporated?

The Housing Development Needs Assessment (EHDNA) (January 2020) identifies future growth and local needs across the Borough for the plan period. In relation to future employment needs, the Assessment concludes that the prospects for future growth within the Borough were supported by a number of potential regeneration projects, such as a new Garden Community, proposed for the north of the Borough and the Stafford Station Gateway. We consider that to deliver on the Borough's growth potential and aspirations, a new Garden Community is essential.

The EHDNA seeks to define a local housing need for the Borough upon which the Local Plan is able to set its housing requirement. As set out within the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) the minimum starting point for housing needs should be derived from the government's standard method; which, in the case of Stafford provides a figure of 408 dpa. It is worthy of note that the Government's Local Housing Need methodology projects between 2019-2029 rather than extending to 2040 as the plan period of the Local Plan is proposed to do. We would suggest as a minimum that the standard method calculation of 408dpa should at least be extended across the whole of the plan period.

Whilst we agree that the 'minimum' housing need for the Borough is 408 dwellings per annum (dpa) there is sufficient evidence within the Local Plan's evidence base to suggest that a much higher housing requirement should be sought.

In the first instance, the current Plan for Stafford Borough 2011-2031 requires 500dpa to be delivered and the Stafford Borough Authority Monitoring Report (2019) demonstrates that 699 houses were delivered in the period from 1st April 2018 – 31st March 2019. In line with the NPPF's requirement for LPAs to boost significantly the supply of housing, we consider that the new Local Plan should not plan for less housing than is currently required through the Development Plan and ideally, not less than the Borough has demonstrated it can deliver and sustain.

The EHDNA sets out six alternative future housing need scenarios which will inform the determination of the housing requirement for the revised Plan (Option B-G). Options B and C were discounted from the Local Plan process as they would deliver less housing than proposed through the standard method (Option A). We agree with this approach.

The alternative options were also run using accelerate headship rates (referred to as Partial Catch Up rates – PCU). This has been done to account for the effect of the recession on 15-34 year old headship rates and essentially seeks to balance that effect against the Sub National Household Projections (SNHP) which draws on past trends (including the continued suppression of household formation rates). We support the application of PCU rates to the modelling to reflect the accelerated rates at which young people are able to form households since the end of the recession. As such, we consider scenarios D-G within the EHDNA with a PCU rate adjustment having been made.

As set out within Table 5.1 of the Local Plan, through growth scenarios D, E, F and G the suggested housing requirements range between 435 and 683 dpa or, when the PCU is applied, between 489 and 746 dpa. We consider that the latter range provides only scenarios which seek to deliver significant job growth (adjusted for non-suppressed headship rates) should be the Local Plan's starting point for considering the levels of housing growth it requires to deliver an economically aspirational Local Plan.

Scenario D Cambridge Econometrics (CE) Baseline – this considers the implications of achieving the net job growth set out in the CE baseline forecasts (c. 5,920 jobs over the period 2020-2040); Scenario E Jobs Growth – 'Policy on' considers a regeneration scenario which includes the growth projected to occur at a potential New Garden Community / Settlement and Stafford Station Gateway, around 12,500 new jobs; Scenario F 'Past trends' Jobs Growth. Projecting forward the Compound Average Growth Rate (CAGR) job growth of 0.83% achieved between 2000 and 2018 in Stafford Borough over the 2020-2040 plan period; Scenario G Jobs Growth – Jobs Boost. Based on the CE baseline forecast with net growth increased by 50% accommodated above existing CE baseline (resulting in a total job growth of c. 8,900).

For the reasons set out above, and explored later in more detail, we support the delivery of a new Garden Community. Scenario E, in considering the jobs growth which includes that regeneration scenario requires the delivery of **711 new dwellings per annum** and sits towards the upper end of the range set out above but is broadly in line with recent delivery within the Borough which has been demonstrated to be sustainable.

In addition to the above, the Local Plan sets out the that when current overall housing delivery rates in Stafford Borough are considered alongside a proposed 30% affordable housing target, it is unlikely that the full affordable locally assessed need (252-389dpa) could be achieved. We support the Local Plan insofar as it advocates, via an uplift in the total housing numbers for the Borough, a boost in the delivery of the required affordable housing. As such, our Client's support for a higher housing requirement is considered to support that approach through the provision of an uplift.

It is not the intention of these representations to propose a housing requirement for the Local Plan. However, we consider that a housing requirement within the above range, and in particular towards the upper end of that range, is most likely to meet Stafford Borough's future housing and affordable housing requirements alongside employment and regeneration aspirations in a sustainable and demonstrably deliverable way.

*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?*

We consider that deducting the commitments from the current Development Plan over the period 2020 – 2031 could result in an under-delivery against the housing need (with economic growth and PCU applied). This is because the Council cannot have absolute confidence that all of these commitments can be delivered by 2031. Deducting these dwellings may undermine the Council's growth aspirations and we would advise against this.

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 support the inclusion of a new Garden Community for the reasons set out throughout this response.

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?

The Sustainability Appraisal sets out a series of Strategic Options, or 'reasonable spatial strategy alternatives' and aims to identify and test alternative approaches to growth both in terms of overall quantum of growth and distribution of this growth across the Borough. The strategic growth options are set out below:

- Growth Option 1: Stafford and Stone only focussed development.
- Growth Option 2: Stafford, Stone & Key Service Village focussed development.
- Growth Option 3: Disperse development across the new settlement hierarchy.
- Growth Option 4: Focus all new development at new Garden Communities only.
- Growth Option 5: Disperse development across the new settlement hierarchy and also at the new Garden Community / Settlement.
- Growth Option 6: Allocate development to settlements linked by existing transport corridors.

We agree that not all of the Growth Options, as set out above, are compliant with the guidance of the NPPF. In particular, Options 1, 2 and 4 are contrary to the NPPF, as they focus development in one area and restrict development in other settlements across the Borough. We consider that it is appropriate to discount those options as viable solutions to delivering the housing requirement.

Options 3, 5 and 6 are therefore the only Growth Options considered within the Local Plan Draft to be compliant with the NPPF, as they provide a spatial basis for the development of the new Local Plan and to promote growth across the Plan area.

We support a balanced spatial distribution strategy, which any of Options 3, 5 and 6 are capable of supporting as a matter of principle. However, as set out within these representations, and indeed within the Council's evidence base, there are a number of significant benefits to delivering a new garden village community as an option for meeting current and future growth requirements (particularly where we support a level of growth towards the higher end of the Council's proposed range of options). As such, we do not support Option 3, on the basis that it does not include a sustainable new settlement. Indeed, we support Option 5 which comprises the same spatial growth option but with the addition of a new settlement / extension as a source of growth. Option 6 is

considered further and does not preclude the delivery of a sustainable new settlement or major extension.

For each of these growth options, a high growth scenario and a low growth scenario have been established. The Sustainability Appraisal finds that significant positive effects are anticipated for all options with regards to the theme of housing by delivering, in full, against the minimum housing requirement over the plan period. Option 5(low) and 5(high) are also considered likely to deliver significant positive effects with regards to the SA theme of economy and employment by distributing new employment floorspace across the Borough. We support the delivery of Option 5 with regard to the proposed employment benefits which the SA envisages.

*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?*

Yes, we support the incorporation of at least one Garden Community in the New Local Plan for the reasons set out and because it would relieve pressure for development within settlements across the Borough without limiting the ability of the Local Plan to deliver necessary development through the settlement hierarchy and ensure the ongoing vitality of the key town centres in the Borough. We continue to support that as an objective of the existing Plan for Stafford Borough 2011-2031 and maintain it should be given importance in the emerging Local Plan.

*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? Please explain your answer.*

We consider that the New Local Plan should utilise a combination of the following:

1. Growth Option Scenario E
2. With Partial Catch Up
3. With No Discount
4. With a Garden Community at Meecebrook

This would be the best option to deliver the Borough's economic growth aspirations in an achievable and sustainable manner over the plan period and beyond it. The importance of the Garden Settlement, particularly given HS2 growth, is acknowledged in the evidence base.

The Strategic Development Site Options Study (December 2019) also forms part of the evidence base for the emerging Local Plan and provides an assessment of potential strategic growth location options. In respect of the location for a new Garden Community / Major Urban Extension, the Council have identified four potential "reasonable alternatives" through the Strategic Housing & Employment Land Availability Assessment (SHELAA) (2018). The Strategic Development Site Options Study independently tests each study, alongside other locations identified by the project team.

### *Strategic Location*

The Strategic Development Site Options Study states that the Borough's central location and excellent connectivity to the Strategic Road Network, particularly the M6, provides opportunities for future growth and suggests that successful development of future employment land associated with new

Garden Communities would depend on the site's connection to the motorway network. We support those conclusions.

Our Client's interests at Meecebrook are located to the north of the Borough, an area which is identified as having good accessibility to Stone and Stoke-on-Trent and is well positioned to link into existing fast rail connections and future improvements via HS2. The Study concludes that the development opportunity at Meecebrook comprises a significant area of land and there would be potential to provide an autonomous new settlement with the requisite transport infrastructure upgrades.

Moreover, the use of brownfield land is encouraged by the NPPF (and PPG) and should be supported throughout the Local Plan as a key contributor in delivering sustainable development. The Site at Meecebrook is largely comprised of brownfield land and is therefore considered to be a sustainable location for Garden Community.

### *Housing Trajectory*

Option 5 and 6 set out above both utilise at least one of the Garden Community Reasonable Alternatives. Due to the lag in time between conception and delivery of the Garden Communities we consider that it will be necessary for the housing trajectory for the plan period to be addressed in two phases:

- The first phase (2020-2030) will assume no contribution by the Garden Communities under consideration. Accordingly, during the first phase the Borough will be dependent on the delivery of housing via existing commitments, housing allocations and windfall development throughout the settlement hierarchy. The housing trajectory for that initial phase of the plan period can be structured accordingly.
- The second phase (2030-2040) will see contributions from the new Garden Communities combined with other allocations across the settlement hierarchy to meet the Borough's housing requirement.

Importantly, and further to our point on conflict with existing communities above, the delivery of a Garden Community has the potential to remove development pressure from existing settlements in the last ten years of the Plan (post 2030) and beyond through the delivery of a new community. Such an approach allows the Borough to, in essence, get a head start on planning for future housing requirements beyond the proposed plan period.

### *Delivering a Sufficient Supply of Employment Land*

The provision of employment land within a Garden Community has the potential to accommodate a wide range of employment types that will offer opportunities to a large proportion of the population. As set out above, those development opportunities, particularly with regard to Meecebrook, can be delivered in a sustainable location which supports a wider focus of development on the Borough's strategic transport connections.

The development of a Garden Community will deliver additional employment land, which alongside a significant additional workforce (both proposed and existing), will help drive forward the Borough's economic aspirations for growth as well as delivering sustainable patterns of development.

*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?*

Yes, as it recognises the importance of the Garden Community for delivering economic growth in a balanced manner.

### **Delivery of the Garden Village at Meecebrook**

The proposed new settlement site at Meecebrook is comprised of significant levels of previously developed land, including our Client's Magnor Plant depot and the Swynnerton Training camp. The site is located approximately 4.5km from Stone, the second largest town in the Borough. It is substantial in size (1,125 hectares), making it the largest in comparison to rest of the potential strategic locations set out in the Consultation Document and is expected to deliver between 9,000 - 11,500 homes and between 8,000 and 15,000+ jobs. This means it is large enough to support infrastructure which will ensure its sustainability, for instance a new train station. The Council have recognised the significant work and lead-in time for a development of this nature and are not reliant on it for unrealistic early delivery of housing in the plan period. That being said, our Client's site, whilst currently occupied, will be vacant by 2020 and available for development without any legal constraint. If the Council opt for Meecebrook as its preferred option, our Client will fully support this and work positively with all stakeholders and landowners towards delivery of this important development.

In respect to the potential spatial scenarios, set out in Figure 5.1 in the Consultation Document and explored above, it is considered that all reasonable options have been considered within the Local Plan. We have set out above the reasons why the development of a Garden Community is should be supported and will provide various social, environmental and economic benefits in accordance with the objectives set out at Paragraph 8 of the NPPF. This includes the significant contribution to delivering a level of housing land and economic land which is capable of supporting the Council's long term economic growth aspirations. Indeed, the development of Meecebrook site would deliver a such a substantial amount of the Borough's housing and employment requirements that there would be limited need for another Garden Community to be identified at this stage.

### **Summary**

These representations have been prepared on behalf of Morgan Sindall Construction Ltd in response to Stafford Borough Council's Issues and Options Consultation Document on its New Local Plan. It sets out our Client's support for the New Local Plan and in particular a new Garden Community at Meecebrook. The potential for a Garden Community in the Borough will be determined by a number of factors, as set out in the Consultation Document. These include:

- The level of housing requirement to be set by the New Local Plan;
- The spatial strategy ultimately selected;
- Whether a combination of more than one Garden Community is selected to support the spatial strategy;
- Their deliverability including provision of new infrastructure, services and facilities.

We conclude that the adoption of a housing requirement towards the upper end of the Council's range of growth scenarios is essential for it to meet its economic growth aspirations and regeneration needs; including the delivery of affordable housing.

We support a spatial strategy which will deliver a sustainable pattern of delivery across the Borough's settlement hierarchy and will help deliver the growth needed to support the Council's economic strategy; both now and in the future.

We consider that Meecebrook provides the principal opportunity to achieve this, as it is expected to deliver between 9,00-11,500 homes (including affordable provision) and between 8,000 to in excess of 15,000 jobs alongside associated infrastructure including green infrastructure. This presents the best opportunity to deliver sustainable growth on a large scale that is supported by the necessary infrastructure and facilities.

Our Client's land will be available and developable as part of this new settlement and we lend our full support to the Council should it wish to pursue this option.

We trust that our comments are of assistance, and we would welcome the opportunity to discuss these with you further in the future.

Yours faithfully,

Yours sincerely



**JAMES BONNER**  
Planning Associate

Enc.

Call for sites submission

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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>	<b>Mr</b>	<b>Mr</b>
<b>First Name</b>	<b>Richard</b>	<b>James</b>
<b>Surname</b>	<b>Hickman</b>	<b>Bonner</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>	<b>Head of Planning</b>	<b>Associate Planner</b>
<b>Organisation (if applicable)</b>	<b>St Modwen Properties PLC</b>	<b>Barton Willmore</b>
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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.

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<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name: James Bonner</b>		<b>Organisation: Barton Willmore obo St Modwen</b>			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>	<b>6</b>	<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>H and K</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please see the enclosed covering letter which responds to the following questions:</p> <p><u>Question 6.H – To assist the rural economy should the Council:</u></p> <p>a) <u>Allocate land for employment purposes throughout the rural areas of the Borough?</u>  b) <u>If so, which area(s) do you consider would be appropriate for this purpose?</u>  c) <u>Extend existing rural business parks? If so, which ones?</u></p> <p><u>Question 6.K – Are there any further potential Major Developed Sites in the Green Belt that should be considered for inclusion?</u></p>					

***Please use a continuation sheet if necessary***

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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**

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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](http://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](mailto:forwardplanningconsultations@staffordbc.gov.uk)



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

**BY EMAIL**

29989/A3/MAS/JB/bc

20<sup>th</sup> April 2020

Dear Sir/Madam,

**REPRESENTATIONS TO THE DRAFT STAFFORD BOROUGH LOCAL PLAN (ISSUES AND OPTIONS CONSULTATION) - MEAFORD BUSINESS PARK**

We write on behalf of our Client, St Modwen Properties, in respect of their land interests at Meaford Business Park, at the site of the former Meaford Power Station (the 'site'). Our Client supports the continued identification of the site within the Stafford Borough Local Plan Issues and Options (the 'draft Plan') as a site which will assist in meeting the Borough's economic and job growth aspirations. However, there are a number of potential concerns with the draft Plan in its current form which could undermine this potential, and we offer suggestions below.

**Background**

Redevelopment of the former Meaford Power Station was approved in May 2007 (98/35897/OUT). For ease of reference, permission was granted for:

***"Change Of Use to B1 B2 & B8 Buildings Sports Facilities Roadways And New Roundabout 35897".***

An extension of time (10/13609/EXT) was approved on 21st July 2010. A second extension of time (14/21379/EXTO) was approved on 7th May 2015, with permission granted for:

**"Extension of time on Outline Planning permission number 98/35897/OUT as previously extended by planning approval number 10/13609/EXT (Change of use to B1, B2 and B8 buildings, roadways and new roundabout)".**

This latest planning permission has been implemented.

Condition 6 provides an overall limit of 110,000 sqm of B1, B2 and B8 floorspace, of which no more than the following shall be developed:

- B1(a) – 4,999 sqm
- B8 – 60,000 sqm



It also limits development to a collective footprint not exceeding 96,500 sqm and within an area not to exceed 34.1 hectares of the site<sup>1</sup>.

A new roundabout has been delivered to provide southern access via Meaford Road. This was in part funded by Staffordshire County Council. There have been a number of Reserved Matters and Conditions approved on the site, including, but not limited to:

- Unit 3 (14/21379/EXTO, approved 7th May 2015) – this has been built out and is now occupied;
- Units 4 and 5 (17/27506/REM, approved 5th February 2018) – this has been approved but not yet constructed; and
- The spine road (15/22557/REM, approved 6th October 2015) – this has since been built in part, with the road serving Unit 3 and the future Units 4 and 5.

The Meaford Energy Centre (MEC) is a 299MWe gas-fired power station with integral gas and electricity connections. It is proposed within the middle of the site and is subject to a Development Consent Order (DCO) which was made on 16th July 2016 and came into force on 2nd August 2016. There are a number of pre-commencement requirements and the development must be commenced by 19th July 2021. The 2014 extension of time approval was subject to a Unilateral Undertaking that effectively deducted the DCO floorspace and footprint from the approved outline floorspace and footprint.

### **Economic and Housing Development Needs Assessment (January 2020)**

Given the length of time passed since the original permission, and the evidence base which informed it, the quantum of B-Class floorspace to meet current demand and market trends has changed. The Economic and Housing Development Needs Assessment (EHDNA) recommends a requirement of between 68 to 181 hectares of employment land over the 2020-2040 Plan period, and a recommended split as follows:

- B1a/B1b Office – 30%
- B1c/B2/B8 – 70%

We will be reviewing the employment evidence in more detail to support the case for a new, site-specific policy. However, at this stage, it is clear that the market has moved on from when the outline planning permission and subsequent extensions of time were approved. As the EHDNA states at paragraph 5.29, 'future job growth prospects are modest due to past trends, and the restructuring of the Borough's manufacturing sector is set to continue.' This is based on past trends and is reflected within the recommended mix of uses, although it is also acknowledged that discussions 'identified significant future growth aspirations for the manufacturing sector within the Borough, particularly for advanced manufacturing'.

We therefore suggest a more flexible approach to B-Class employment floorspace is included within a specific policy for the site. This would support the EHDNA's objectives, which states:

***"It will be important to ensure that any employment land identified in the emerging plan takes into consideration the views from the market and relative market strengths to ensure demand for employment land is captured across the Borough, capitalising on its identified strengths".***

In addition to significant market changes, the EHDNA points to a shortage of 'good quality B-Class land' in the Borough compared to the Black County and Southern Staffordshire areas. The proximity

<sup>1</sup> The original outline planning permission limited the floorspace through Condition 2 to 10,000sqm of B1, 40,000sqm of B2 and 60,000sqm of B8.

of the site to strategic road network and key centres such as Stoke, and Stafford places the site in a good position to contribute to addressing this shortage. In the Industrial and Logistics sector for example, demand is outweighing supply, with vacancy rates typically low due to constant demand and competition (paragraph 6.47). The 2018 Stoke-on-Trent and Staffordshire LEP's Strategic Economic Plan (SEP) points to the LEP's target to grow employment at a time when 'skills gaps and shortages are becoming more acute'. As the Development Plan and draft Plan are in-part reliant on the site coming forward (see the next section), this highlights the importance of the site. The EHDNA also identifies the site as an 'important industrial estate and business park' at paragraph 6.11.

### **Employment Land Supply**

The site is included within the list of committed developments and is referred to within the draft Plan as a strategic site<sup>2</sup>. We would however query the levels of floorspace indicated in the EHDNA, where it states the remainder of the outline permission is 15.93 hectares and the Meaford Energy Centre is 16.6 hectares. In line with permission 14/21379/EXTO, the site has a development potential of 34.1 hectares, and only a small part of the site (Unit 3) has been built out for B Class uses to date (around 1.57 hectares). The DCO for Meaford Energy Centre has a developable area of 5.7 hectares, which as per the Unilateral Undertaking, should be deducted from this 34.1 hectares. Notwithstanding this, the site remains the largest commitment in the Borough by a significant margin and is clearly important in delivering economic and job growth.

Given the changing market demands both in the past and going forward, there is a need to ensure that the site is provided with the support it needs to deliver this growth within the new Plan period. This is acknowledged in the draft Plan at paragraph 6.10, where it states that there is a:

**"Need to allocate employment land in the new Local Plan and for this to be sufficiently flexible in nature so that the evolving needs and demands of the economy can be accommodated. Similarly, the floor space will need to be allocated within the Borough where it has most benefit to existing and potential employers".**

We agree with this and would suggest that our site is given similar flexibility through a specific policy.

### **Response to questions in the draft Plan**

Question 6.H – To assist the rural economy should the Council:

- a) Allocate 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?
- c) Extend existing rural business parks? If so, which ones?

We support the Council's aims to assist the rural economy, and our Client's site can clearly contribute towards this. However, the draft Plan does not recognise the strategic function of the site. It can make a significant contribution to wider regional economic aims, including needs across local authority boundaries. This should be considered in light of paragraphs 11(b), 23, 35, 80, 81 and 82 of the NPPF.

Question 6.K – Are there any further potential Major Developed Sites in the Green Belt that should be considered for inclusion?

Paragraph 6.22 in the draft Plan identifies the site as being a Major Development Site (MDS). Whilst the draft Plan and its evidence base identifies the site as the largest committed development and a strategic site which will help to 'offset past trends of a declining manufacturing sector' (paragraph 2.11), the reliance on the MDS is at odds with this and is not justified. The MDS designation appears to be carried forward from the Part 1 Plan, which in turn carried the designation forward from the

<sup>2</sup> Paragraph 2.11 of the draft Plan

2001 Local Plan. The MDS reference was referred to in Annex C of PPG2, which was relevant at the time of the 2001 Local Plan but is not retained in the 2019 NPPF.

The approach to employment growth in the draft Plan needs to be positively prepared and effective and a site-specific policy is the best way to achieve this. The baseline of the former power station use and its floorspace / footprint, and the protection this affords to the openness of the Green Belt, can be maintained through this.

### **Suggested Change**

In light of the matters raised above, we consider that the draft Plan needs a specific, robust policy to support a range of B-Class uses on this significant previously developed site. This will ensure a strong and flexible policy basis to support a new outline application and deliver growth on the site through the Plan period. We will provide suggested wording for a suitable policy as part of the next draft Plan consultation, following further discussion with Officers. This will be supported by evidence, which will set out the need for a policy, as well as how this growth can be delivered whilst protecting the environmental sensitivities of the site, including the Green Belt. A site-specific Green Belt Appraisal is appended to this representation. Within this, it identifies that there is an acceptance of a degree of harm to the openness of the Green Belt, which is core to the MDS, outline planning permission and MEC DCO. It states at paragraph 4.7:

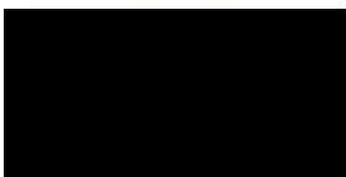
**“It is also apparent that as the site makes only a limited contribution to the Green Belt; that it is evidently not the Council’s intention that the site should remain permanently open; and that there is potential for mitigation of the proposed uses through a range of approaches, consideration should be given to release of the site from the Green Belt. Were this to be done and development within the site controlled via a site-specific policy rather than the more general MDS Policy E5, incorporating the mitigate considerations above, and closely tied to a detailed study of landscape and visual mitigation principles, there is potential for more sensitive development of the site than the current framework specifies.”**

Within this context, and alongside the matters raised above, there is clear justification for a site-specific policy for the site.

We trust these representations are helpful to inform the next stage of the draft Local Plan. We ask that we could please meet you at your earliest convenience to discuss this important site and its role in the Plan. Thank you.

Should you require any clarifications of the points raised please do not hesitate to contact me or Mark Sitch.

Yours sincerely



**JAMES BONNER**  
Planning Associate

Enc.

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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>	<b>Mr</b>	<b>Mr</b>
<b>First Name</b>	<b>Alastair</b>	<b>James</b>
<b>Surname</b>	<b>Budd</b>	<b>Bonner</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>	<b>Director</b>	<b>Associate Planner</b>
<b>Organisation (if applicable)</b>	<b>Trentham Leisure Limited</b>	<b>Barton Willmore</b>
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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<b>Part B: Your Comments</b>				
<i>Please complete a new Part B for each representation you wish to make.</i>				
<b>Name: James Bonner</b>		<b>Organisation: Barton Willmore obo Trentham Leisure Limited</b>		
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>		<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>Please see the enclosed covering letter which responds to the following questions:</p> <p><u>Question 3.A – Do you agree that the Vision should change?</u></p> <p><u>Question 5.B – a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough’s future housing growth requirements? b) Should a Partial Catch Up rate allowance be incorporated?</u></p> <p><u>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?</u></p> <p><u>Question 5.D – i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?</u></p> <p><u>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?</u></p> <p><u>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?</u></p> <p><u>Question 6.L – 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? b) Are there any visitor economy themes that should be more explicitly addressed? If so, which?</u></p> <p><u>Question 7.A – a) Do you consider that the hierarchy for Stafford Borough should consist of</u></p>				

Stafford and Stone town centres with Eccleshall local centre?

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

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?

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?

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.

***Please use a continuation sheet if necessary***

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

**NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS**

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

**BY EMAIL**

30989/A3/HP/JB/bc

20<sup>th</sup> April 2020

Dear Sir/Madam

**REPRESENTATIONS TO STAFFORD BOROUGH COUNCIL LOCAL PLAN REVIEW - ISSUES AND OPTIONS CONSULTATION**

**SUBMITTED ON BEHALF OF TRENTHAM LEISURE LIMITED – TRENTHAM ESTATE AND GARDENS**

Thank you for inviting comment on your Issues and Options consultation for the Stafford Borough Council Local Plan Review (the 'draft Plan'). We make these representations on behalf of our Client, Trentham Leisure Limited (a wholly owned subsidiary of St Modwen Properties Plc), who operate the Trentham Estate and Gardens ('the Estate'). For the reasons explained below, our Client's request that the Estate is identified in the emerging Local Plan with a specific policy that supports the long-term sustainability of the Estate as a key tourism destination. This policy would also provide a basis to support sensitive reuse/redevelopment of parts of the Estate which will assist with this aim, as well as supporting the long-term future for the various heritage assets within the Estate.

Our representations are set out into sections that relate to the Sections of the consultation document and we have limited our responses to the questions we consider relevant at this time.

**Section 3 – Vision and Strategic Objectives**

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

The Vision as expressed in the adopted Local Plan is too lengthy and a new Vision is required that reflects what the draft Plan's aims and objectives are ultimately seeking to achieve in the new plan period (to 2040). The previous Scoping the Issues Consultation established six key and reoccurring themes that will inform this. One of these themes is the provision of an enhanced service centre

and tourism destination. Our Client supports the inclusion of this in the Vision given the importance of tourism for the economy, as we set out in further detail later in these representations. However, we would request the Vision clearly identify the tourism opportunity being Borough-wide, rather than just Stafford Town. This would align more closely with the wider evidence noted below, as well as the Stafford Borough Council Corporate Business Plan 2018-21, which highlights on page 6 that across the Borough:

**“Visitors generate more than £200 million for the local economy with the sector employing around 4,000 people.”**

It goes on to set out corporate aims at page 7 to “Grow the visitor economy” and “Provide new leisure and recreation facilities”. This is not limited to just Stafford Town.

## **Section 5 – The Development Strategy**

The published Economic and Housing Development Needs Assessment (EHDNA) states that the Borough comprises its own HMA however through the Duty to Cooperate *“the Council should undertake further discussions to determine how this interdependence impacts upon housing requirements within the adjoining HMAs/FEMAs, and how it will be addressed”*. As discussions with neighbouring authorities progress, there may be a requirement to assist in meeting unmet needs. This is particularly pertinent for Stoke-on-Trent and Newcastle, where the draft Joint Local Plan Preferred Options suggests Green Belt release is required to meet housing needs. The Estate is well related to Stoke and Newcastle and some housing on the previously developed parts of the site here could assist. We have previously discussed the opportunity for housing on the site with the Council and this was agreed in principle. Clearly, subject to further detailed discussions, including on location.

Question 5.B – a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough’s future housing growth requirements?

Paragraph 5.8 sets out six possible future housing need scenarios. When comparing to the absolute minimum housing need figure derived from the Standard Method (408 dwellings per annum), two of these scenarios are inadequate and therefore as that Council state, should not be considered further. We encourage the Council to take a proactive approach to delivering growth and development within the Borough to ensure job and housing growth is balanced and that increasing affordability is tackled<sup>1</sup>. As such we suggest that growth scenarios E, F and G should be considered further.

b) Should a Partial Catch Up rate allowance be incorporated?

We support the use of Partial Catch Up rates to try and address suppressed household formation within the Sub National Household Projections.

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?

We consider that deducting the commitments from the current Development Plan over the period 2020 – 2031 could result in an under-delivery against the housing need (with economic growth and

<sup>1</sup> Paragraph 2.7 of the draft Plan

PCU applied). This is because the Council cannot have absolute confidence that all of these commitments can be delivered by 2031. Deducting these dwellings may undermine the Council's growth aspirations and we would advise against this.

Question 5.D – i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?

The settlement hierarchy needs to reflect the development strategy options which is considered to omit a review of the boundaries of the North Staffordshire Green Belt. The lack of justification for this approach is increased given the North Staffordshire Urban Areas is proposed as Tier 3 but is unable to play any meaningful role in meeting future development needs, which will direct growth to less suitable and sustainable locations.

The identification of the North Staffordshire Urban Areas within the Settlement Hierarchy at Tier 3 acknowledges the important role it plays in meeting development needs. The Settlement Assessment (July 2018) suggests that 'Trentham Gardens' is included within this. We support this position given the sustainability of the Estate and its proximity to a number of services and facilities, existing housing and we would request that the wording within the draft Plan is clear that this includes Trentham, rather than relying on the wording within the evidence base.

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?

Yes, particularly with reference to the Estate as noted above. We would disagree with the comment in Table 5.5 on Redevelopment/Development implications, where it states that 'To remove "washed over" status or the introduction of a settlement boundary would require a review of the Green Belt'. We are proposing a site-specific policy for the Estate, and as part of this a settlement boundary and/or allocation boundary to clearly identify the relevant land would not remove its Green Belt status or the protections afforded by it. This could be reflected in the wording of the specific policy for the Estate.

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 have no objection to the principle of the plan-led strategy being underpinned by the development of a new Garden Community, Major Urban Extension and/or combination of these options, provided that the preferred spatial option(s) will:

- deliver at least the minimum number of homes and new employment land required in the plan period;
- meet housing, employment demand and market requirements;
- address evidence of local housing need across the Borough and not perpetuate issues of affordability, particularly in the early years of the plan (i.e. where larger scale developments are dependent upon upfront infrastructure being in place first);
- allow for flexibility to enable a range of other sites of a suitable scale to come forward in other sustainable locations, supporting the plans aims and objectives (as a whole);
- be demonstrably viable and deliverable; and
- be underpinned by a robust evidence base.

If Meecebrook were the preferred option, the Estate would be well located in relation to this new settlement and sensitive development at the Estate to reinforce its current role could help in delivering sustainable growth in the north of the Borough. This could also assist with delivering the aspirations of the Constellation Partnership HS2 Growth Strategy (2017).

## **Section 6 – Delivering Economic Prosperity**

Paragraph 6.9 acknowledges that there has been a shift in employment in the Borough towards other industries including retail and tourism. Paragraph 6.10 states that there will be a need to allocate employment land that is flexible in nature to meet the evolving needs and demands of the economy and this should be allocated within areas where it has the most benefit to existing and potential employers.

The published Economic and Housing Development Needs Assessment (EHDNA) finds that future job growth prospects in the Borough are modest due to past trends and it notes that the restructuring of the Borough's manufacturing sector is set to continue<sup>2</sup>. It sets out a number of growth scenarios and a recommended mix of uses to assist in delivering economic growth in light of this. The draft Plan identifies the tourism sector as an important element of the job market, accounting for 10% of all employment across the County<sup>3</sup>.

In discussing current trends, paragraph 6.34 of the EHDNA identifies that Stafford could grow its tourism section and needs to become a destination for eating, drinking and leisure activities. It is not clear whether this is in relation to just the Town Centre, but the benefits of leisure and tourism elsewhere in the Borough are clear in local policies and the NPPF. For instance, paragraph 83 which looks to enable 'sustainable rural tourism and leisure developments which respect the character of the countryside'.

The Stoke-on-Trent & Staffordshire Enterprise Partnership Strategic Economic Plan (April 2018) expresses a long-term interest in strengthening sectors including the visitor economy. This aim is supported by the Stafford Borough Council Corporate Business Park 2018-2021 which seeks to grow the visitor economy.

The Destination Staffordshire Partnership Strategy and Stafford Borough Corporate Business Plan both recognise the increasing economic importance to the Borough of the visitor economy. Further, the Stoke on Trent and Staffordshire Enterprise Partnership's Strategic Economic Plan (SEP) identifies the visitor economy as a growth sector valuing it at £1.6bn County wide. The emerging Stafford Borough Economic Growth Strategy values the Borough's visitor economy sector as being worth £222m per annum.

On a regional scale, the Midlands Engine Strategy sets out five key objectives to address the region's key weaknesses, build on its opportunities and boost productivity and economic growth. It highlights the tourism economy as significant, noting that 'in 2013, the economic value (GVA) of tourism in the Midlands was £6.33 billion' (page 26). This is reflected in the Strategy's fifth key objective of 'Enhancing quality of life in order to attract and retain skilled workers, as well as to foster the local tourist economy.'

**Question 6.L – 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**

<sup>2</sup> Paragraph 5.29 of the EHDNA.

<sup>3</sup> Paragraph 6.24 of the draft Plan.

in their current form or do they need adjustment? If so, how? b) Are there any visitor economy themes that should be more explicitly addressed? If so, which?

The Development Plan already recognises the importance of the Estate as a tourism destination through Policy E6 of the Part 1 Plan. We support this but consider that adjustment to the policy is necessary in light of the above.

Our Client has reviewed their Business Plan and from this it is clear there is more that the Estate can and should offer to ensure it remains a successful visitor attraction over the long term. This would help to deliver further local employment and economic growth, as well as a meaningful contribution to the Council's Corporate and Local Plan objectives, the aims of the SEP and regional growth through the Midlands Engine Strategy. To deliver this we consider it is necessary to have a specific policy for the Estate. This policy would recognise the special qualities of the natural and built environment here, whilst providing a policy basis for sensitive growth to ensure the sustainable future of the Estate and its numerous designated heritage assets.

In terms of 6.L(b), we consider that other visitor economy themes should be explored in relation to the Estate and its unique context i.e. heritage, including the restored Gardens; leisure attractions; commitment to nature conservation; and its popularity as a retail destination. The specific nature of the Estate, alongside the potential for growing it as a destination, justifies a standalone policy within the draft Plan. We would like to discuss the principle of a policy and its wording with you ahead of the next stage of the draft Plan consultation. We would propose to contact you in this regard. Our written response to this next stage of the Plan would be supported by technical work around the need for a policy and how the proposals for the Estate can be delivered sensitively.

## **Section 7 – Delivering Town Centres That Address Future Needs**

Question 7.A – a) Do you consider that the hierarchy for Stafford Borough should consist of Stafford and Stone town centres with Eccleshall local centre?

No. We consider that Trentham Retail Village should be recognised within the retail hierarchy as a Local Centre or another specific designation outside of the hierarchy of Town and Local Centres. This would recognise the function of the Retail Village and its appeal as a retail destination, which also supports the attractiveness of the wider Estate as a tourism destination. We will provide further evidence around this as part of the next consultation.

## **Section 8 – Delivering Housing**

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

We support the continued encouragement of the re-use of brownfield land; however we recognise that greenfield land will still be required to maintain a housing land supply and meet economic growth aims. All brownfield opportunities should be explored to maximise the contribution that can be made on previously developed land, and some parts of the Estate could assist in this respect, albeit on small-scale and heritage led.

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?

A range of density thresholds is considered to be more appropriate than a blanket density threshold as this would enable development to respond to the characteristics of different areas i.e. the urban,

semi-rural and rural. The density thresholds however should be flexible to enable higher density development where it is demonstrated that this is appropriate.

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?

The Nationally Described Space Standards can be useful in helping to deliver high quality development, but they should not be applied rigidly across all new dwellings and conversions. Their use would need to be justified in terms of viability and the implications this could have for housing supply. If adopted they should be used as a guide alongside other policies around good design and amenity so that each proposal can be assessed on a site-specific basis. Flexibility is required, and this is particularly relevant for the conversion of properties in a heritage context.

### **Section 9 – Delivering Quality Development**

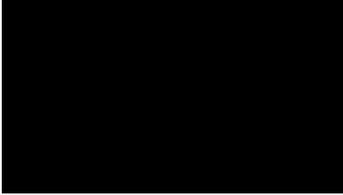
Question 9.I – Should the new local plan:

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.

We consider a number of these responses to be relevant for different parts of the Borough. In the case of the Estate, where the historic and natural environment are so important to its success, we consider that it would be most appropriate to utilise a combination of (4) and the protections offered by the Planning (Listed Buildings and Conservation Areas) Act 1990 and the NPPF. This again supports the need for a specific policy for the Estate to allow any future beneficial development proposals to be informed by this context, alongside other key considerations such as the Green Belt.

We trust these comments are useful and we look forward to discussing with you in more detail the long-term attractiveness and sustainability of the Estate. Please contact me or Mark Sitch in the meantime if you have any queries. Thank you.

Yours sincerely



**JAMES BONNER**  
Planning Associate

**Stafford Borough Council Local Plan Review  
Issues and Options 2020 -2040**

**Consultation response  
by**



**March 2020**

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## **Appendices**

**Appendix I - Interim SA of Issues & Options Local Plan, February 2020 – JAM Consult Ltd.**

**Appendix II – Location / Site Plan**

## **1 INTRODUCTION**

### **1.1 Context**

- 1.1.1 Dean Lewis Estates is a professional strategic land promotion company specialising in the delivery of mixed-use residential development and associated community infrastructure.
- 1.1.2 This submission provides Dean Lewis Estates response to, and representations in respect of, the Stafford Borough Local Plan Issues and Options consultation 2020 -2040.
- 1.1.3 This submission focuses on the key planning policy considerations for the Stafford Local Plan Review in order to enable its successful implementation, thereby sustainably meeting the identified full objectively assessed needs for housing (OAN), employment and social and environmental advancements during the twenty year plan period.
- 1.1.4 The submission is accompanied by a representation produced by Jam Consult Ltd on behalf of Dean Lewis Estates in respect of the Interim SA of Issues & Options Local Plan, February 2020. For reference these are attached at Appendix I of this submission.
- 1.1.5 At Appendix II of this submission a Location – Site Plan is provided that depicts the area of land in which Dean Lewis Estates Limited has a commercial interest in the form of a legal ‘Promotion Agreement’ with the landowner, Baden Hall Enterprises Limited.

## **2 LEGAL COMPLIANCE**

### **2.1 Duty to Cooperate**

- 2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. A failure to demonstrably execute the duty to cooperate cannot be rectified through modifications.
- 2.1.2 Stafford Borough adjoins authorities within this area of the West Midlands and shares a functional relationship with wider area in the context of its housing market area. Significant unmet housing need and unmet demand exists in pockets of the housing market area as does deprivation.
- 2.1.3 The plan should ensure that the unmet housing needs within the HMA is properly addressed with neighbouring authorities under the auspices of the duty to cooperate, throughout the evolution of the Review Local Plan.
- 2.1.4 Clear evidence is required to demonstrate that Stafford Borough Council Local Plan has executed its' duty to cooperate by working with neighbouring authorities in order to address the cross boundary strategic issue of unmet housing needs.

### **2.2 Sustainability Appraisal**

- 2.2.1 Section 19 of the 2004 Planning and Compulsory Purchase Act, requires that Local Plans are tested by way of a Sustainability Appraisal (SA), thereby meeting the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. The SA should be carried out at each stage of the Plan's preparation. Whilst Stafford Borough Council has undertaken a SA on the Issues and Options, we ask that these representations are considered together with the matters alighted upon in our supplemental representations produced by JAM consult Ltd in respect of Sustainability Appraisal Matters.

### 3 OBJECTIVELY ASSESSED HOUSING NEED

#### 3.1 Stafford Borough - Objectively Assessed Housing Need

- 3.1.1 The Stafford Borough Council Stafford Borough Council: Economic and Housing Development Needs Assessment published in January 2020 states that:

***"The Local Housing Need [LHN] for the Borough as generated by the standard method in the National Planning Policy Framework [Framework] and Planning Practice Guidance [PPG] generates a figure of 408 dwellings per annum [dpa]. Given the demographic behaviour patterns observed in the Borough identified in the Mid-Year Population Estimates [MYEs], and the alignment between these and the 2014-based Sub National Population Projections [SNPP], there are no significant exceptional circumstances to justify departing from the standard methodology approach as a minimum. However, delivering more than 408 dpa is supported through the Framework and PPG in several ways, and the Local Plan should consider the extent documents and respond accordingly to which the standard method estimate of LHN is consistent with the economic success of Stafford and the wider area."***

- 3.1.2 It is notable that the minimum OAN is **408** and is some 92dpa lower than the existing adopted plan target 2011 -2031 that was established using a different methodology to that of present requisite 'Standard Methodology'.
- 3.1.3 However, circumstances exist that influence the council's decision to deliver higher growth than the standard OAN. The government announcement in February 2020 of the implementation of HS2 alongside other radical improvements to local transport networks across the country means that the Stafford Station Gateway Hub Station will be delivered during the plan period. This will create a major economic boost to Stafford Borough and the surrounding communities. The beneficial economic impact of this decision will also serve to provide major advancements in social mobility for the area.

- 3.1.4 Consequently, the Council have considered the potential of the area to deliver enhanced growth and have therefore considered higher employment and housing growth scenarios in its emerging Local Plan. The objective being to ensure a sufficiency of economically active workforce to meet needs arising from the projected economic growth, in particular taking into account the future strategic economic growth planned for the Borough through a potential Garden Community and at Stafford Station Gateway.
- 3.1.5 Dean Lewis Estates will work positively with Stafford Borough to assist with the successful delivery of the growth above full OAN.
- 3.1.6 The Stafford Borough Council: Economic and Housing Development Needs Assessment notes that:
- “These developments are anticipated to generate around 12,470 jobs. 647 dpa (711 dpa based on the Partial Catch Up [PCU] Sensitivity Scenario) would be required to support this level of job growth. This represents a lower level of jobs growth than in the Past Trends scenario, which would generate 13,126 jobs and require 683 dpa (746 dpa PCU). However, it is considered unlikely that this level of jobs growth could be sustained going forward given the current economic climate.”**
- 3.1.7 Dean Lewis Estates acknowledge and support the growth projections that are moderated downwards whilst having regard the fact that once these developments are established and are at full capacity in terms of their employment generation, it is logical that the employment directly related to these developments will not continue to grow at these accelerated rates. However, the regular review of the Local Plan and its evidence base on five yearly intervals should be closely scrutinised as the indirect and long term employment multiplier effect linked to the establishment of the HS2 Hub and Stafford Station Gateway and the opportunity at Garden Community at Meece Brook cannot yet be fully understood.
- 3.1.8 Should the evidence base demonstrate that delivery of the full OAN and planned higher growth is constrained, Dean Lewis Estates require that the council produces clear evidence as to how it has sought to reduce or eliminate significant adverse impact in the

pursuit of its' development options. Where avoidance or mitigation is not possible, evidence should be adduced to demonstrate that compensatory measures have been deployed where possible.

## **4 STAFFORD BOROUGH ISSUES AND OPTIONS**

### **4.1 Question 1.A & B – Scoping**

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

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

4.1.1 **Response:** The Scope of Evidence cited within Table 1, 'Studies commissioned to support Stafford Borough Local Plan 2020-2040', is comprehensive and, subject to additional detail, will ultimately provide the necessary evidence to support a robust LPS strategy during the plan period. However, as the Plan Period is scheduled to operate during a 20 year plan period, it should be clearly stated within the 'Introduction' to the forthcoming adopted Local Plan that the statutory five year reviews will be conducted as expeditiously as possible so as to ensure any necessary alterations to the adopted policies are implemented as close as possible to each five year cohort. Early review in advance of each five-year time horizon is therefore essential.

**How will the Council assess the environmental impacts of the emerging Local Plan?**

4.1.2 **Response:** The Sustainability Appraisal being undertaken for the new Local Plan which sits alongside other necessary appraisal processes will need to ensure that all reasonable alternative development scenarios are thoroughly tested in terms of their sustainability credentials and deliverability. Related Representations produced by Jam Consult Ltd. on behalf of Dean Lewis Estates address matters in this regard.

## **5 SPATIAL PORTRAIT**

### **5.1 Housing**

- 5.1.1 It is notable that the affordability ratios (average income to house price) are lower in the Borough at (6.82) than the average across England as a whole (8.0). However, it is also notable that affordability ratios within the borough are on an increasing trend which remains a concern for the housing market within Stafford. In order to address and reduce the potential for the long-term increasing unaffordability ratio, the Spatial Portrait for Stafford Borough will need to respond to different growth strategy and spatial distribution of development that contrasts from the last adopted Local Plan.
- 5.1.2 The delivery of the Strategic Development Locations and incremental development at existing settlements as set out within the adopted SBC LP is meeting with success in terms of delivery, but a step change in delivery of housing growth is required to address long term structural affordability issues within the Housing Market Area. In order to achieve this, strategic growth locations out with the existing settlement hierarchy is required to achieve accelerated sustainable growth.
- 5.1.3 The Meecebrook Garden Settlement is strongly supported in this regard. Such an approach will provide a strategic growth location that will enable the Borough to meet its Objectively Assessed Housing Needs and deliver higher levels of growth during the plan period alongside incremental growth around other key towns and settlements. A new Garden Settlement will enable accelerated growth once development has commenced and become established as a new settlement. This growth location and possibly other complementary locations that are identified within the emerging plan will help to address and boost the delivery of affordable housing during the plan period.

## 5.2 Economy

- 5.2.1 Stafford Borough is attractive to inward investors due to its central location and good transport links, availability of labour and well-located employment sites. New strategic employment sites are being taken up at Stafford and Stone, including Redhill Business Park, the extension of Beacon Business Park and Meaford. Whilst the area has experienced a decline in its manufacturing sector, other sectors such as logistics, the service sector, knowledge-based industry and the tertiary sector have all experienced good levels of growth.
- 5.2.2 The New Garden Settlement at Meecebrook will exploit the opportunity to supplement the existing employment corridor which between Stone, Yarnfield and Eccleshall. Housing and additional employment growth this spatially preferable spatial location will offer major sustainability benefits, placing new homes near to existing and proposed employment destinations.

## 5.3 New Garden Settlement

- 5.3.1 The I&O confirms that Stafford Borough is considering a variety of visionary and far reaching proposals for the development of a new garden settlement. An early stage in this work has been the assessment of the Strategic Development Site Options for potential locations, which has been published alongside this document as part of the evidence base. This would have the potential to provide a huge economic boost to the Borough including unlocking surplus brownfield land whilst creating a modern and sustainable living and working environment taking development pressure off existing settlements. There is an area of Ministry of Defence land in the north of the Borough and other possible locations which have the potential for thousands of new homes and employment opportunities. Any proposals would also include local shops, community facilities such as schools and medical services, and potentially new transport interchanges. **Dean Lewis Estates strongly support this policy approach.**

## 5.4 The Natural and Historic Environment

- 5.4.1 It is noted that part of the rural landscape is nationally recognised through the designation of the Cannock Chase Area of Outstanding Natural Beauty (AONB) in the south east of the Borough.
- 5.4.2 Stafford Borough is also important for its biodiversity and areas of nature conservation. The Borough contains 3 RAMSAR sites (wetlands of international importance) at Aqualate Mere, Chartley Moss and Cop Mere, 15 Sites of Special Scientific Interest (SSSIs) and 4 Special Areas of Conservation (SAC) sites (Cannock Chase, Motte Meadows, Chartley Moss and Pasturefields).
- 5.4.3 Also, the Borough is recognised for its rich historic environment, for example the town centres of Stafford, Stone and many of the rural villages have historic cores which are designated as Conservation Areas. In addition, Trentham Gardens, Sandon Park, Shugborough Park and the German Military Cemetery on Cannock Chase are designated as Historic Parks and Gardens. Notably there are also two areas of Green Belt in the Borough, around the North Staffordshire Conurbation and in the south-eastern area of the Borough, including the Cannock Chase Area of Outstanding Natural Beauty.
- 5.4.4 The proposals for a New Garden Settlement at Meece Brook avoid adverse impacts on these important environmental designations, spatial policy designations and identified heritage assets. Avoidance of adverse impacts upon these designations is a key objective of the NPPF. In terms of environmental sustainability, a New Garden Settlement, in its proposed location at Meecebrook, is demonstrably capable of delivering growth without giving rise to unacceptable adverse impacts. **Dean Lewis Estates consider that, in contrast to other locations within the borough, it should be regarded as being a spatially preferable location for major growth.**

## 5.5 Connectivity

- 5.5.1 Due to its central location in the Country the Borough has excellent road and rail links. Stafford is situated on the M6, with junction 14 to the north and junction 13 to the south. It also has excellent connections to the M54, M42 and M6 toll. The town's accessibility on the West Coast Main Line means that London Euston is only 1 hour and 20 minutes journey time, Manchester 55 minutes and

Birmingham 30 minutes. It is proposed that HS2 may deliver an integrated station in Stafford reducing journey times to London Euston to under an hour, whilst generating additional capacity on other routes.

- 5.5.2 Locally work is being undertaken on a western bypass for Stafford and there is a network of bus services between settlements and within the built-up areas.
- 5.5.3 These locational attributes will, collectively, all contribute toward supporting the sustainable growth at Meecebrook Garden Settlement. The New Garden Settlement will benefit from excellent connectivity to the M6 Motorway at Junctions 14 and 15 and will be linked to Stafford by road which is less than 20min drive time. The road network is already utilised by existing bus services connecting Yarnfield and Eccleshall and the surrounding rural communities with Stafford, Stone and the Potteries conurbation. These services will be significantly enhanced as a consequence of locating the New Garden Settlement at Meece Brook.
- 5.5.4 The West Coast Mainline runs through the Garden Settlement site. Investigative work is underway to determine whether it is feasible and viable to create a new set down station on the West Coast Mainline within or near to the Garden Settlement. Whilst the delivery nor the sustainability of the New Garden Settlement is contingent upon a new railway station here, if delivery of a new station here is secured, then the site would be regarded as being highly sustainable due to its transport connectivity.

## **5.6 Towns and Rural Areas**

- 5.6.1 Stafford town is at the heart of the Borough. With a population of approximately 66,000 it is the County town and has an expansive retail and leisure offer including the Gatehouse Theatre, new Odeon Luxe Cinema and recently established Riverside retail and leisure development. Victoria Park is a popular leisure destination and it is currently undergoing a £2.5 million restoration including a new café and outdoor entertainment areas. Stafford hosts the headquarters of the Borough and County Councils and exhibits a historic market square and town centre. Recently there has been significant new housing growth on the outskirts of the town with new educational,

open space and community facilities to follow. Key employment and business parks support the local economy; there is also a hospital, a MOD site and The New Beacon Group education campus (previously Staffordshire University).

- 5.6.2 Stone is an attractive market town to the north of the Borough which has expanded in size in recent years (around 16,500 residents). It hosts a large and very popular business park (including employers such as Jaguar Land Rover) and has a bustling town centre. Aston Marina is a popular tourist destination, especially with the canal boat community. A new state of the art leisure centre has recently been built and there are proposals for extensive play and recreational facilities at Westbridge Park.
- 5.6.3 There are a large number of market towns and villages across the Borough including Eccleshall, Gnosall, Barlaston, Little Haywood and Colwich, Great Haywood and Hixon. There are also smaller hamlets and many individual rural dwellings. The most northern parts of the Borough are different in character and are neighboured by the suburban fringes of Newcastle-under-Lyme and Stoke-on-Trent at Clayton, Blythe Bridge, Trentham and Meir Heath.
- 5.6.4 **Dean Lewis Estates consider that the inter connectivity of the main towns of Stafford and stone with a new Garden Settlement at Meecebrook would serve to reinforce and enhance a highly sustainable spatial pattern of growth within the context of the Borough.**

## 6 VISION AND STRATEGIC OBJECTIVES

### 6.1 Question 3.A, 3.B & 3.C

**Do you agree that the Vision should change? – YES**

**Do you agree that the Vision should be shorter? - YES**

**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? - YES**

- 6.1.1 It is noted within the I&O that the Vision, as expressed in the current Local Plan, is now considered to be too long. The council intend that the New Local Plan should be guided by a new vision that is shorter and more focussed on the aspects that the plan will seek to deliver over the period 2020-2040. The Council is minded to develop a Vision for the Plan that is more succinct and which conveys a strong sense of its development priorities for the next plan period. This would need to recognise the key themes that emerged from the "Scoping the Issues" consultation, and the Visions expressed for the Corporate and Growth Strategies. Importantly the Vision (along with the underpinning Objectives and constituent policies) will need to recognise the necessary contribution by planning and the consequent commitment in Stafford Borough to the Government's stated Policy for Carbon Neutrality by 2050. This is set out below at Figure 3.1.

Figure 3.1

Scoping the Issues Consultation – Vision and Objectives

- Need for high quality design and architecture to create a strong sense of place and community
- Stafford to provide an enhanced service centre and tourism destination
- Town centres to provide a quality environment and accommodate specialist shops and flexibility of uses
- Recognise and address issues associated with Climate Change and Global Warming
- General support for the utilisation of renewable energy sources and ensuring low carbon via, wind, geothermal, solar and hydropower all being cited as possible alternative sources of energy.
- Future proofing development via the use of technology (e.g. Artificial Intelligence, vehicle charging points, recycled / grey water etc...)

## 6.2 Question 3.D, 3.E & 3.F

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

- 6.2.1 **DLE Response:** The Spatial distribution of development will need to change for the future plan. Its utility in its current form is no longer capable of deliver the requisite growth levels for the borough.

### Is the overall number of objectives about right?

- 6.2.2 **DLE Response:** We support the overall objectives but consider that they need to be condensed into a more cogent form as set out below.

### Should there be additional objectives to cover thematic issues? If so what should these themes be?

- 6.2.3 **Response:** The Local Plan Review presents the opportunity to establish a positive strategy to guide Stafford Borough's development over the next 20 years. New strategic growth including a new Garden Settlement, regeneration, environmental enhancements should all be key themes key Stafford's enshrined within the vision for future growth plans and how the area should evolve and function by 2040.
- 6.2.4 Dean Lewis Estates consider that the '**Local Plan Vision and Objectives**' should incorporate the following key themes.
- 6.2.5 The Vision should confirm that the council is committed to promoting and realising the opportunities that will flow from Stafford Station Gateway (HS2) and the Garden Community at Meece Brook. **Dean Lewis Estates strongly supports this approach.**
- 6.2.6 The vision must also ensure that an appropriate modicum of high-quality development around the Stafford, Stone and the existing key service villages commensurate with their role and function and centres.
- 6.2.7 Overall, by 2040 Stafford Borough will have become a highly attractive place to reside and work. Access to major infrastructure and facilities should be commodious for all. With revitalised urban centres, its stunning natural and historic assets and countryside, the borough will be a place at that aspire to live within.

- 6.2.8 The borough will have secured the best of its intrinsic heritage and landscapes alongside high quality development to strengthen the area's distinctive character. The traditional centres will continue to attract growth that should be sensitively assimilated into the urban fabric to ensure these attractive locations for homes, jobs, leisure and cultural activities thrive.
- 6.2.9 Meecebrook new Garden Settlement will be celebrated as the defining community that has been planned and designed for future generations, integrating the best technology available to reduce the its own carbon footprint. Environmental stewardship will be a key facet of the development, modes of travel will facilitate energy efficiency modes such as the electric vehicle for private car journeys and where possible public transport. Train connectivity will be exploited to its greatest potential and within the development pedestrian and cycle journeys will be encouraged through sensitive and appropriate design layout. It will become a new community but of vital importance will be its inter connectivity with existing communities and destinations within the borough.
- 6.2.10 Stafford Borough will have established a regional profile for successful and ambitious growth and accrued benefits from wider strategic developments. New development in Stafford's main towns and villages will have responded positively to the character of the surrounding environment and needs of existing communities.
- 6.2.11 Planned growth will have delivered a Borough that its residents have pride in, providing homes for all sectors of the community, supported by infrastructure to deliver education, transport, health and community services. Vibrant and complementary towns, local and village centres will provide a focus for community life.
- 6.2.12 The distinct towns and villages that make up Stafford Borough will be connected through effective transport networks, with green infrastructure links supporting nature and healthy communities, and defining separation between settlements. The quality of design and public realm will have delivered an accessible borough where all can move around safely, and which sets a new character for urban centres.

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- 6.2.13 Inequalities in health, education, economic and social opportunities will be reduced. Stafford Borough will have successfully grown its economy, capitalising on its learning quarter of higher and further education providers to raise skills levels; gaining competitiveness from its strategic location, delivering high speed broadband services to businesses and communities; securing and developing its diverse business base and attracting inward investment in a range of quality employment sites.
- 6.2.14 Safford will be defined by development that respects the character, functions and qualities of the natural and historic environments, in order to reduce the risk of flooding, to manage finite natural resources, and to ensure that important wildlife and heritage assets are protected and opportunities are realised to enhance their condition and connectivity. Stafford's growth will promote a low carbon economy, seeking to address, mitigate and adapt to climate change. Development will be managed to facilitate the sustainable supply of minerals and management of waste. The area's strategic importance in the energy sector will be secured, and new technologies supported in helping to achieve a low carbon economy.

## **7 SUSTAINABILITY AND CLIMATE CHANGE**

### **7.1 Climate Change Mitigation**

7.1.1 Question 4.A notes that 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. Two questions arise in this regard.

**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?**

7.1.2 **DLE Response** – If the new Local Plan opts to require that all new development 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, it is fundamental that any such requirements are clearly specified so that developers can interpret the regulations correctly. As building regulations continue to be reviewed and improved a more logical approach would be to rely on those separate legal requirements. When 'Code' was introduced, ambiguity arose due a lack of specificity in terms the actual measures required to be implemented to achieve a 'Zero carbon rating. Such ambiguity should be avoided.

**b) What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?**

7.1.3 **DLE Response** – New policies should focus on ensuring a sufficiency of high-speed broad capacity to enable a reduction in the need to travel for work. In respect of the New Garden Settlement at MeeceBrook, the master panning of the site will enable the day to day needs of the community to be met locally thereby reducing to the need to travel. Energy production at the local level has not yet reached a sufficiently advanced stage in the UK to make it fully viable and cost effective in respect of ongoing maintenance and management. The new local plan policy framework should ensure that, where possible, new development is designed in such a way so

as to be easily adaptable to accommodate new sustainable sources of renewable energy infrastructure.

## **7.2 Renewable Energy**

7.2.1 The I&O notes that the transition to a renewable energy network is crucial in securing a low carbon future. The NPPF states that Local Plans should provide a positive strategy for the use of energy from renewable sources. This includes identifying sites suitable for renewable and low carbon energy infrastructure and enabling developments to draw energy from on-site renewable sources.

7.2.2 Guaranteeing the new Local Plan makes suitable provision for the transition to a low carbon and renewable energy network is therefore of great importance.

### **Question 4.B**

**Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?**

7.2.3 **DLE Response** - The renewable energy market is developing rapidly as is the research and development into new sustainable and renewable energy sources. The new policy framework should avoid specifying the exact type of energy production technologies to be deployed within developments but instead should encourage flexibility in anticipation of this dynamic and rapidly changing market.

### **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?**

7.2.4 **DLE Response** - This approach is supported provided that the technology is both widely available and is demonstrably viable having regard to all other financial contributions that will be required to be levied from new developments to ensure adequate and timely provision of necessary infrastructure.

## 8 THE DEVELOPMENT STRATEGY

### 8.1 Delivering a sufficient supply of homes – the growth options

8.1.1 Having regard to the recently published '**Stafford Borough Council Economic and Housing Development Needs Assessment**', it is noted that a key conclusion of the EHDNA is that Stafford Borough comprises its own Housing Market Area (HMA) and that its 'Functioning Economic Market Area' (FEMA) predominantly aligns with Stafford Borough's administrative boundary.

8.1.2 Whilst this is acknowledged, it is also important that, under the 'Duty to Corporate', the housing provision at the proposed New Garden Settlement at Meece is considered in terms of contribution or impact upon the West Midlands region, the Potteries conurbation and Newcastle-under-Lyme borough and Shropshire.

#### 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?**

8.1.3 **DLE Response** - Using the Government's standard Local Housing Need methodology 2019-2029 a minimum Housing Requirement of 408 dwellings per annum (dpa) is indicated. This figure should be regarded as the minimum housing requirement as there are no exceptional circumstances which justify any reduction in this figure.

8.1.4 **DLE Support** the Council's approach of not giving further consideration of 'Scenarios B and C' for the New Local Plan, as these provide housing requirement figures of less than 408 dpa.

8.1.5 The other growth scenarios D, E, F and G suggest housing requirements ranging between 435 and 683 dpa. These also include an allowance for 'Past Catch Up' being applied between 489 and 746 dpa. It is also noted that the current adopted Local Plan for Stafford Borough 2011-2031 requires 500 dpa to be delivered.

- 8.1.6 Equally important is the necessity to establish an appropriate requirement for affordable homes commensurate with the newly arising need for affordable housing in the borough during the plan period.
- 8.1.7 Within the EHDNA report the level of affordable housing need for Stafford Borough is identified as ranging between 252 and 389 new affordable dwellings per year, depending on the percentage of income used (252 - 25%; 389 - 33% of income). The Planning Practice Guidance 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. When current overall housing delivery rates in Stafford Borough are considered alongside 30% of this new housing being affordable it is unlikely that the full affordable locally assessed need (252-389) could be achieved. However, the positive effect of delivering a higher number of homes above the minimum OAN across the Borough during the plan period would have the impact of helping to reduce any deficit in affordable homes delivery.
- 8.1.8 **DLE would support** the 'Scenario E Jobs Growth – Policy on' as this also has regard to regeneration and the growth projected to occur at a potential New Garden Community / Settlement and Stafford Station Gateway and projecting the creation of around 12,500 new jobs. The increased number of homes above the base OAN would also assist with the delivery of higher levels of affordable housing delivery across the plan period which will also serve to assist in reducing the current deficit. Further is important that an allowance for Past Catch Rates are integrated into the housing requirement as households that have not formed due to unforeseen reasons will not necessarily have disappeared or migrated elsewhere and therefore such an allowance is important for both social wellbeing and economic prosperity.

### **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.**

- 8.1.9 Caution should be exercised regarding the method used to calculate any discounting in this scenario. It could result in an artificially low housing allocation figure in the new plan if the under implementation is not properly accounted for within the residual 6,000. It is also pivotal that the new Local Plan would lack any effective plan led mechanism to recapture this planned growth.
- 8.1.10 A more robust way of recalibrating the figure and avoiding double counting would be to rescreen of the sites within the 6,000 to make an informed judgment regarding those allocations that can be deemed to have a reasonable prospect of delivery during 2020 and 2031 and those that can be deemed to not meet the test of deliverability.
- 8.1.11 This reassessment of existing allocations would enable reasoned judgment to be applied to each existing site allocation to determine the likely prospect of delivery or otherwise, thereby providing an evidenced based assessment of deliverable sites rather than applying an arbitrary discount to the 6,000 dwellings.

## **8.2 The 2019 New Sustainable Settlement Hierarchy**

- 8.2.1 It is important for the new Local Plan to direct the growth in both employment and housing supply to the locations best suited and most attractive to the market, whilst ensuring there are no locations that are over-burdened or that other locations are not starved of growth. Paragraph 65 of the National Planning Policy Framework (NPPF) states that a housing requirement figure should be established for the whole strategic policy making area, with strategic policies setting out housing provision for designated neighbourhood.

## **Green Belt**

- 8.2.2 Less than a quarter of the Borough's area is identified as Green Belt, and the NPPF reinforces the Government's commitment to maintain its protection and states that these should only be altered where 'exceptional circumstances are fully evidenced and justified'. Before changes are made to Green Belt boundaries, the Council is required to 'demonstrate that it has examined all other reasonable options for meeting its identified need for development'.
- 8.2.3 Therefore, on the assumption that the Borough's development need for the Plan period can be accommodated on land not designated as Green Belt, the new Local Plan will not look at revising the Green Belt boundary, although NPPF does permit limited infilling in villages, limited affordable housing and limited infilling or the partial or complete redevelopment of previously developed land within the Green Belt.
- 8.2.4 **DLE support** the council's approach that advocates an approach whereby the 'Growth Strategy' can be accommodated across the borough without the need to release green belt.

### **Question 5.D**

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

- 8.2.5 **DLE Response** – The starting point for considering the housing requirements for each Parish area across each neighbourhood area throughout Stafford Borough, including the towns of Stafford and Stone is supported. The EHDNA has reflected paragraph 66 of the NPPF to provide an indicative figure for each neighbourhood area based on the population of the neighbourhood, the availability of land, house prices & affordability, together with available services. We consider this to be most robust methodology for understanding housing need in each neighbourhood area and matching that need to availability of land and testing deliverability on a site by site basis.

- 8.2.6 The Settlement Hierarchy assessment in 2019 was based on the same methodology that was applied to the adopted local plan previous to that. The basis of its preparation is agreed as is the inclusion of the smaller settlements.
- 8.2.7 However, what is evident is that amount of housing and employment need, as evidenced by the EHDNA, is highly unlikely to be genuinely deliverable during plan period if the same settlement hierarchy and growth strategy is extrapolated forward in the new local plan up to 2040. Key infrastructure delivery that is required to accommodate the existing development growth strategy up 2031 is required to facilitate further major development at the SDL's. it is notable that some 6,000 dwellings remain under delivered against the existing planed target, not all of which will come forward in the current plan period. The delay of the such key infrastructure, added to potential for under delivery on existing allocations, means that both the requisite amount of growth in terms of housing and employment would be highly likely to significantly underdeliver by 2040 if the same settlement hierarchy only is pursued as the only appropriate spatial locations for growth.

### 8.3 Growth Options - Potential Spatial Scenarios

8.3.1 For clarity, this section of the representations deals with the questions raised within the SBC Issues and Options Consultation Document February 2020. It also incorporates comments and representations in respect of the related Stafford Borough Strategic Development Site Options, produced by AECOM.

#### 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**

8.3.2 Please refer to paragraphs 8.3.3 to 8.3.7 below in response to the three questions above.

8.3.3 **DLE Response** – The '**Potential Spatial Scenarios**' are proposed to be honed down to a single spatial strategy to underpin the new Local Plan. The six 'Potential Spatial Scenarios', some of which include planned new Garden Communities are described as follows:

- 1** Intensification of town and district centres
- 2** Dispersal of development
- 3** Garden communities
- 4** Intensification around the edges of larger settlements and strategic extensions
- 5** 'String' settlement/ settlement cluster
- 6** Wheel settlement cluster

8.3.4 However, the potential scenarios have not been directly applied to the local context. A further round of Regulation 18 consultation should be undertaken to enable appropriate analysis of the scenarios in this regard. Consequently, it is also apparent that, when commenting on the appropriateness of the scenarios in the Stafford

area, it is difficult to do so as the evidence base does not follow a wholly logical approach.

8.3.5 A further round of regulation 18 consultation would enable a more robust appraisal of the narrowed 'Potential Spatial Scenarios'. In turn, this will also enable the Sustainability Assessment to properly test the comparative cumulative impacts of the narrowed options in order to reach a properly informed choice at regulation 19 stage of the plan making process. By doing so, a more refined and narrowed set of 'Potential Growth Options' can be formulated that directly relate to an applied local context. This will demonstrate that all reasonable alternatives for development options have been properly and robustly considered.

8.3.6 By way of example the following initial comments highlight the concerns that we have at that stage.

- **Potential Garden Communities** – the reader is asked to state which garden community is most appropriate, however, the amount of information provided on the potential communities is not sufficiently detailed at this stage for readers to be able to make a fully informed choice e.g. the constraints and opportunities for each location are not fully articulated.
- **Potential Growth options** – this section follows the garden communities, which appears to be illogical in terms of chronology. It would be logical for the potential New Garden Communities to follow on from this option. The different growth options should be considered first before potential garden communities, which may form part of a growth option. Of the 6 growth options put forward, 3 are considered to be non-compliant with the NPPF and have been discarded. It is not clear why these options were included if they were not reasonable alternatives. Options 5 and 6 are then grouped together as one option, which may ultimately be logical, however this approach is contradicted in the SA which considers them separately.
- **Garden Communities** – the draft Plan assumes that no homes will be built within the first ten years of the Plan, as it is assumed delivery will not occur before 2030. A reason for this assumption is not given.

Similarly, it is assumed that the garden communities will achieve a delivery rate of 500 homes p/year. This figure is around twice the recommended delivery rate that it is advised in recent reports such as the Letwin Review, which suggest 250-300 p/annum is more realistic. More refined work needs to be undertaken in this regard for the option to be regarded as credible.

- 8.3.7 For completeness, please also refer to the related representations produced by JAM Consult Limited and which are contained at **Appendix I** of this Submission.

#### 8.4 Potential Garden Communities in Stafford Borough

- 8.4.1 Stafford Borough Council are currently exploring a number of potential locations to accommodate a new Garden Community (which also includes Major Urban Extensions) as reasonable alternatives, which have been identified by the Council and have been independently assessed (AECOM26). These are briefly described below:

i.	<b>Land north and east of Gnosall.</b> This area of land could accommodate up to 3,500 new homes and supporting employment.
ii.	<b>Land between Gnosall and Haughton</b> north of the A518 between Stafford and Newport. This area of land could accommodate up to 3,250 new homes and supporting employment.
iii.	<b>Seighford</b> , a largely agricultural site with an airfield and established employment land either side of the B5405 to the west of Stafford town. This area of land could accommodate up to 5,250 new homes and supporting employment.
iv.	<b>Land to the north of Redhill Business Park</b> and to the west of the A34 near to M6 Jn14 Stafford North. A large tract of land that could accommodate up to 5,000 new homes and supporting employment land.
v.	<b>Meecebrook</b> , focussed around Cold Meece south of Swynnerton. This has the potential for up to 11,500 new homes and supporting employment land.
vi.	<b>Hixon.</b> An ex-WW2 airfield located to the east of the Borough. Much of the site is currently unused and is partly developed as an industrial park. The site on the edge of Hixon could be expanded to accommodate up to 2,750 new dwellings and supporting employment land.
vii.	<b>Land East of Weston.</b> There are a number of environmental constraints in this area but there is potential to bring forward up to 2,000 new homes and supporting employment land.

- 8.4.2 It is noted that the final choice of Garden Community(ies) / Major Urban Extensions will be determined by a number of factors including:

- The level of housing requirement to be set by the New Local Plan;
- The spatial strategy ultimately selected;
- Whether a combination of more than one Garden Community is selected to support the spatial strategy;
- Their deliverability including provision of new infrastructure, services and facilities.

8.4.3 Based on these scenarios and determining factors the council pose two related questions.

### **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.**

8.4.4 **DLE Response** – The utilisation of a Garden Community is essential to the successful delivery of the new homes and employment space needed to the serve the community of the Stafford Borough up to 2040. When considering the constraints manifest within the borough in terms of physical constraints, environmental designations and policy constraints, it is evident that the incremental growth based around the existing settlement hierarchy or the expanded settlement hierarchy as proposed within the new Local, would not be capable of meeting the boroughs needs in a timely, or more importantly, a sustainable manner. The most appropriate form of potential garden Community Proposal is considered below.

8.4.5 **Option V. The Meecebrook Garden Settlement** is demonstrably the most sustainable option. It has the ability to deliver a comprehensive range of essential community facilities that are required to support a new community. Its geographic location enables excellent access to a significant level of existing employment within the immediate vicinity of the proposed location for the new garden settlement. The site and surrounding environs are already

well endowed with good range of community sports and recreation facilities. Delivery of the site will be relatively unconstrained across much of the development site as approximately two thirds of this site is green field. It is well connected by road to the county town of Stafford and is easily accessible to Stone, and the potteries conurbation. Public transport provision that can be secured by funding made available from the development will allow for ease of movement of people to such locations making the site highly sustainable from a transport and connectivity point of view.

- 8.4.6 A new Garden Settlement at Meecebrook with a quantum of housing Circa (11,000 new homes) and major amount of employment over approximately 75ha, also has the demonstrable ability to secure major benefits in terms of biodiversity net gain and the ability to provide for long term social wellbeing. The developable area within the site will account for only half to two thirds of the land within the new settlement. This enables new county parks to become established alongside areas of land set aside environmental mitigation and enhancement. Overall, the site will provide for the health and wellbeing its resident community and will also provide major areas of improved environment that will endure for future generations.
- 8.4.7 The majority of the site lies outside of the consultation areas attributed to the Cannock Chase Area of Outstanding Natural Beauty (AONB), Site of Special Scientific Interest (SSSI), Special Area of Conservation (SAC) and any other designations such as Special Protection Areas (SPA). It avoids Green Belt release is not constrained by flooding and surface water management can be adequately attenuated on site. There are no other policy or environmental designations or constraints that would inhibit the deliverability of the site.
- 8.4.8 There are only three main landowners involved and one professional strategic land promoter, Dean Lewis Estates. The brownfield elements of the site will need to be thoroughly examined to establish whether the deliverability of the whole proposal would be impacted upon in terms of viability resulting from any remediation costs.
- 8.4.9 **DLE** would advocate that the Garden Settlement Proposals are tested through the SA on their own merits. Following this appraisal exercise

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the proposals should then be tested as part of refined but integrated spatial strategy for the borough as part of comparative testing exercise to establish the most and appropriate growth strategy to be taken forward within the local plan up to 2040. We consider that the most robust way in which to undertake this further level of refined testing of reasonable alternatives would be by way **a further round of regulation 18 consultation.**

## 8.5 Potential Growth Options

- 8.5.1 All reasonable options will be assessed to test their appropriateness to deliver the development strategy for the New Local Plan 2020-2040.
- 8.5.2 The council has presented the following options during this stage of consultation:

**Growth Option 1:** Stafford and Stone only focussed development. This would be characterised by the scenarios "Intensification of Town and District Centres"; and "Intensification around the edges of larger settlements and strategic extensions" described above.

**Growth Option 2:** Stafford, Stone & Key Service Village focussed development (business as usual – reflecting the approach in the adopted Plan for Stafford Borough). This would be characterised by a combination of the scenarios "Intensification of Town and District Centres"; "Intensification of edges of larger settlements and strategic extensions"; and "Wheel" described above.

**Growth Option 3:** Disperse development across the new settlement hierarchy. This would be characterised by a combination of the scenarios "Intensification of Town and District Centres"; "Intensification of edges of larger settlements and strategic extensions"; and "Dispersal of development" described above.

**Growth Option 4:** Focus all new development at new Garden Communities only. This would be characterised by the scenario "Garden Communities" described above.

**Growth Option 5:** Disperse development across the new settlement hierarchy and also at the new Garden Community / settlement. This would be characterised by a combination of the scenarios "Intensification of Town and District Centres"; "Intensification of edges of larger settlements and strategic extensions"; "Garden Communities"; and "Dispersal of development" described above.

**Growth Option 6:** Allocate development to settlements linked by existing transport corridors. This would be characterised by a combination of the scenarios "Intensification of Town and District Centres"; "Intensification of edges of larger settlements and strategic extensions"; and "String" described above.

- 8.5.3 Notably, **Options 1 & 2** are considered by the council to be contrary to the NPPF. These options should be jettisoned from the process as the local plan is taken forward. A further and more refined round of regulation 18 consultation would enable this process to be undertaken effectively.

- 8.5.4 **Option 3** is potentially the subject of some major constraints which will need to be applied to the growth expectations of settlements, which is likely to significantly reduce the growth that might actually come forward. These are:
- Flood risk – where a settlement is wholly at risk of flooding so that any likely development site would be in an area of flood risk; and
  - Green Belt
  - Cannock Chase Area of Outstanding Natural Beauty (AONB), Site of Special Scientific Interest (SSSI), Conservation Area and other designations.
- 8.5.5 The council notes that: ***"Where these constraints apply to settlements their growth levels will be limited accordingly. Furthermore, the capacity of existing infrastructure, services and facilities together with the viability of delivering new strategic infrastructure through new development will be a serious consideration"***.
- 8.5.6 This option, given the identified constraints, is highly unlikely to be regarded as being genuinely deliverable and will not provide the requisite growth needed during the plan period.
- 8.5.7 **Option 4** in isolation is incapable the delivering the quantum of growth required to meet the OAN during the plan period.
- 8.5.8 **Option 5** seeks to disperse development across the new settlement hierarchy and also at the new Garden Community. It would allocate development across all the settlements identified in the new Settlement Assessment (where possible having due regard to identified constraints) as well as at the new Garden Community / settlement. Notably, Meecebrook is the only Garden Settlement proposal that is autonomous in terms of its delivery in contrast to all other six remaining Garden Settlement options that are either co-dependent related growth locations or are simply urban extensions. In either of the latter scenarios the fact is that they are reliant on infrastructure off site. Meecebrook has the capability to deliver its own infrastructure all within the confines of one single site.

- 8.5.9 **DLE support** the council's approach with regard to this option in so far as it would be necessary to ensure that sufficient land is allocated within the Settlement Hierarchy until delivery at the new Garden Community commences. At which point the balance of delivery would shift to the new Garden Community. The Council has taken a very cautious view that delivery of the garden Community would not commence until 2030. Whilst it is acknowledged that lead in time for such large project can be significant, we consider that the delivery of the first phases of development could occur around **2026**.
- 8.5.10 **DLE have strong reservations regarding assumptions in terms of anticipated delivery rates.** The draft Plan assumes that no homes will be built within the first ten years of the Plan, as it is assumed delivery will not occur before 2030. A reason for this assumption is not given. Similarly, it is assumed that the garden communities will achieve a delivery rate of 500 homes p/year. This figure is around twice the recommended delivery rate that it is advised in recent reports such as the Letwin Review, which suggest 250-300 p/annum is more realistic.
- 8.5.11 **Option 6** could be an amalgamated with option 5. It would involve significant extensions of communities and realistically the provision of a new Garden Communities within the transport corridors.
- 8.5.12 It looks to maximise the potential for new infrastructure development by building within and adjacent to the larger settlements, their connecting transport corridors and the associated settlements.
- 8.5.13 It is acknowledged that this Option would require a mixture of large and smaller sites in order to enable the achievement of the authority's rolling five-year land supply and NPPF compliance. Furthermore, it would be likely to additionally require development within the main towns and other larger settlements within the settlement hierarchy. However, in order to deliver the requisite growth as identified within the EDHNA, this option would also require a significant contribution within the plan period form a New Garden Settlement.

**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.**

8.5.14 **DLE Response** - We agree that the only NPPF-compliant Growth Options proposed by this document are 3,5 & 6. However, the matters raised in respect of these three options as set out above and within the related SA representations produced by JAM Consult LTD (Appendix 1) appended to this submission demonstrate that the baseline information to support the growth options requires significant refinement in order to provide a legitimate basis against which test potential appropriate growth options.

**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.**

8.5.15 **DLE Response** - In order to deliver the quantum of growth required to serve the need of the borough in terms of new housing and employment, whilst balancing the impacts of development upon known environmental constraints, it is evident that a new Garden Community it is essential to the successful and timely delivery of the identified growth.

**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? Please explain your answer.**

8.5.16 **DLE Response** - The most logical combination that will deliver the most sustainable outcome for the borough up to 2040 and will ensure the delivery of the OAN for housing and employment generation required to meet the needs of the borough is a hybrid of growth Options 5 and 6. This will also enable a significant promotion of the under delivery of new homes to be caught up on. Further remaining 6,000 homes to be delivered as part of the existing adopted local plan should be the subject of a robust reassessment to determinate delivery so as not to create further under delivery in this plan period. Integral to the successful delivery of the whole plan in this regard is the delivery of a new garden community at Meecebrook.

8.5.17 For clarity, the matters alighted upon here and the responses provided by DLE deal with the matters of principle that arise in respect of following section of the consultation Regulation 18 Local Plan.

**8.6 Delivering a sufficient supply of Employment Land****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?**

**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.**

- 8.6.1 **DLE Response 5.K & 5.I** – The recommendations within the EDHNA are supported as they appear reasonable having regard to past trends, future population growth and projected growth rates for GDP. Replacement rates also appear reasonable.

#### **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?**

#### **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.**

- 8.6.2 **DLE Response 5.M & 5.N** - In determining the proportional distribution should it is considered that the Borough's main towns of Stafford and Stone continue to be supported in their respective economic roles. However, it is apparent from the EDHNA projected growth figures that the borough will not attain these potential levels of employment growth if the same settlement hierarchy growth as presently adopted is respected during the forthcoming plan period.
- 8.6.3 A new Garden Community and Major Urban Extensions will be required to achieve the growth and prosperity that the borough aspires to. In determining the proportional distribution, a Garden Community at Meecebrook should be taken forward in order to ensure that existing settlements and the new Garden settlement play complementary economic roles with sufficient provision of a suitable employment land to enable the development of diverse and prosperous economy.

## **9 DELIVERING HOUSING**

### **Question 8.A**

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

- 9.1.1 **DLE Response** - Where appropriate the use of brownfield land for development means that the pressure placed on greenfield land is reduced, preserving the countryside and landscape of an area. The currently adopted Plan for Stafford Borough places preference on the development of brownfield land over greenfield land. A policy actively encouraging the reuse of brown field is supported.

### **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?**

- 9.1.2 **DLE Response** - The NPPF suggests that densities should reflect the sustainability of transport available in an area. For example, where development is situated around sustainable transport hubs, densities could be higher to encourage and support the use of these services. Within the Borough this would have greatest relevance for increased development density in close proximity to Stafford and Stone railway stations. Also, in the context of the New Garden Village at Meecebrook flexibility in terms density is appropriate as this will encourage an innovative response to the site context.

## **Affordable Housing**

### **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?**

9.1.3 **DLE Response** - The affordable housing target is expressed as range and will be kept under constant review. The recent government consultation in respect of 'First Homes' may have an impact on the affordable housing sector and this should be kept under review. If implemented in its current form it is likely to mean that restricted entry level pricing enables wider access to the housing market for first time home buyers. This will have an impact on viability and the ability to deliver affordable housing in overall. The effect of any such market intervention measures should be fully appraised prior to the publication of the regulation 19 submission plan.

9.1.4 Where brownfield land is being promoted for development, appropriate adjustments to the level of affordable homes should be permissible under any new policy arrangement to ensure that such sites remain deliverable and viable.

### **Question 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?**

9.1.5 **DLE Response** - The Creation of new Garden Community at Meecebrook will aid the ongoing objectives of securing the protection and enhancement of biodiversity and open spaces throughout the borough.

9.1.6 A new garden settlement will play an integral role in delivering sustainable development with a 'Green Infrastructure' network of green and blue spaces, landscapes and natural elements that intersperse and connect the character areas of the development and with surrounding areas. The policy formulation should ensure that these opportunities at Meecebrook can be properly captured.

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**10 VIABILITY AND DELIVERY OF DEVELOPMENT**

- 10.1 It is important to review the best way to fund the additional infrastructure needed to support development with the timely delivery of essential infrastructure without undermining the delivery of the plan by overburdening development costs.
- 10.2 A whole plan viability assessment will need to be undertaken to test the combined viability effect of proposed planning policies. This will also tell us whether or not it would be viable to introduce the CIL.
- 10.3 Given the scope of the policy options presented in this first regulation 18 consultation we would urge that the more refined and honed down further Regulation 18 consultation is undertaken. This will enable a viability assessment of a small range of growth options to test the robustness of the viability and deliverability of each option during the plan period.
- 10.4 Delivery of the Garden Settlement at Meecebrook can then be properly integrated into these options and tested accordingly.

# **APPENDIX I**

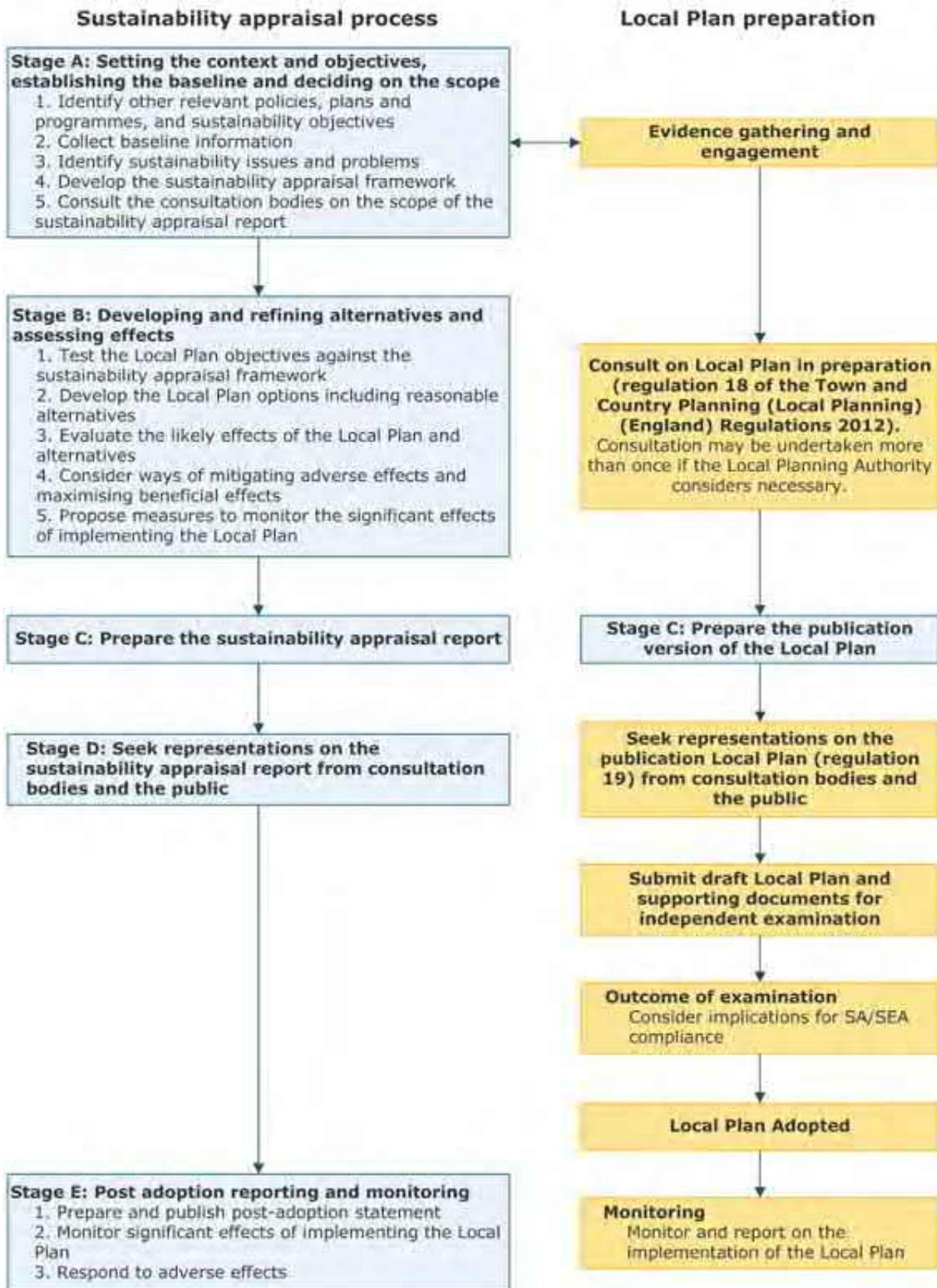
### 1.0 Issues & Options Local Plan

1.1 The Development Strategy of the Local Plan is set out in **Section 5**, including the growth options, potential spatial scenarios and garden communities, for the delivery of the necessary housing. From a review of the information provided the following concerns are raised:

- **Potential Spatial Scenarios** – 6 generic spatial scenarios have been presented including:
  - 1 Intensification of town and district centres
  - 2 Dispersal of development
  - 3 Garden communities
  - 4 Intensification around the edges of larger settlements and strategic extensions
  - 5 'String' settlement/ settlement cluster
  - 6 Wheel settlement cluster

However, the potential scenarios have not been applied to the local context, which makes it difficult to comment on the appropriateness of the scenarios in the Stafford area.

- **Potential Garden Communities** – the reader is asked to state which garden community is most appropriate, however, the amount of information provided on the potential communities is both inadequate and inconsistent for readers to be able to make such a choice e.g. the constraints and opportunities for each location.
- **Potential Growth options** – this section follows the garden communities, which appears to be the wrong way around. The different growth options should be considered first before potential garden communities, which may form part of a growth option. Of the 6 growth options put forward, 3 are considered to be non-compliant with the NPPF and have been discarded. It is not clear why these options were included if they were not reasonable alternatives. Options 5 and 6 are then grouped together as one option, which does not seem logical and is contradicted in the SA which considers them separately.
- **Garden Communities** – the draft Plan assumes that no homes will be built within the first ten years of the Plan, as it is assumed delivery will not occur before 2030. A reason for this assumption is not given. Similarly, it is assumed that the garden communities will achieve a delivery rate of 500 homes p/year. This figure is around twice the recommended delivery rate that it is advised in recent reports such as the Letwin Review, which suggest 250-300 p/annum is more realistic.



PPG 13: Flowchart – Sustainability Appraisal Process

## 2.0 Sustainability Appraisal

- 2.1 The Sustainability Appraisal (SA) is a legal requirement of the planning process and should inform the development of the plan (**NPPF para 32**). The first stage of the SA is the Scoping Report, which should set out the methodology and baseline information for the SA process.

### Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

- 2.2 The Scoping Report, July 2017 relates to **Stage A** of the SA process. The baseline information provides the basis for predicting and monitoring the effects in the sustainability assessment as set out in PPG:

“The term ‘baseline information’ refers to the existing environmental, economic and social characteristics of the area likely to be affected by the plan, and their likely evolution without implementation of new policies. It provides the basis against which to assess the likely effects of alternative proposals in the draft plan. The area likely to be affected may lie outside the local planning authority boundary and plan makers may need to obtain information from other local planning authorities.

Wherever possible, data should be included on historic and likely future trends, including a ‘business as usual’ scenario (i.e. anticipated trends in the absence of new policies being introduced). This information will enable the potential effects of the implementation of the plan to be assessed in the context of existing and potential environmental, economic and social trends.” **PPG Paragraph: 016**  
**Reference ID: 11-016-20190722**

- 2.3 The Council’s Scoping Report only provides a summary of selected baseline data, which does not address the large range of issues that need to be assessed or the baseline information that will be used in the assessment. The list of Sustainability Issues of relevance for the Local Plan is also inadequate, for example the issue of Climate Change is not mentioned at all.
- 2.4 The Scoping Report Technical Appendices, July 2017, also fail to set out the baseline information. Information is provided on the Plans, Policies and Programmes that should be considered in developing the plan, however this information is out of date and needs to be updated.
- 2.5 **Consultation was undertaken on the Scoping Report and Technical Appendices in 2017, however an updated Scoping report has not been prepared in response to the findings.**

### Interim SA, February 2020

- 2.6 The Interim SA of the Issues and Options Local Plan has been prepared by AECOM on behalf of the Council, which has drawn upon the SA Scoping Report 2017. The Report sets out the scope of the Interim SA report at **page 5**:
- “3.2 The aim here is to introduce the reader to the broad scope of the SA. However, it is not possible to define the scope of the SA comprehensively. Rather, there is a need for the SA scope to be flexible and adaptable, responding to the nature of emerging preferred and alternative plan options, and the latest evidence-base.”
- 2.7 The above statement is incorrect. The purpose of the Scope of the SA as set out in the PPG is clear, as are the stages of the SA process, which have not been shown in the report. Whilst the baseline evidence and options assessed may need to be revisited during the course of the plan process, the scope and methodology should be unambiguous.
- 2.8 The responses to the SA Scoping Report 2017 are provided at **Appendix B (p58)**, alongside comments from AECOM. The responses confirm the gaps in the baseline data; plans, policies and programmes; and sustainability objectives and indicators. An updated Scoping Report has not been prepared to set out the new information.
- 2.9 The Interim SA provides a revised SA framework in response to the consultation (**page 5**), however, it does not provide any baseline data or updated plans, policies or programmes. It also provides no maps showing information such as the location of the current environmental designations; key settlements; transport corridors; flood risk zones etc, which makes the information presented very difficult to interpret.
- 2.10 The revised SA framework has condensed the Sustainability Objectives from 20 to 13 in number. Some of the objectives contain too many issues, which makes determining the issue of significance and cause of the effect difficult when undertaking the assessment e.g. Economy and Employment (includes education); Land, Soils and Waste; Population and Communities; whilst others do not cover enough issues e.g. Climate Change Adaptation only considers flood risk. Water availability, temperature changes and air quality should also be considered. In addition, flood risk is not only a result of climate change events and is normally considered as a separate objective. There is also some repetition of issues between objectives e.g. Health & Wellbeing includes accessibility to work, education, health and local services, which is also covered in the objective for Transport. Such repetition can result in double counting.
- 2.11 The amended SA framework has also removed all the indicators. The indicators are needed to help ensure that the effects considered are measurable and can be monitored in the future, as required by the SA Regulations and guidance.
- 2.12 **The baseline information; plans, policies and programmes; sustainability issues; and SA Framework including indicators should all be updated and consulted upon.**

### Stage B: Developing and Refining Alternatives and Assessing Effects

2.12 **Stage B.1** of the SA process sets out the need to test the Local Plan objectives against the SA Framework, in order to ensure compatibility between the two lists of objectives.

2.13 **The SA has not assessed the Local Plan Objectives against the SA framework as recommended in guidance.**

#### Reasonable Alternatives

2.14 **Stage B.2** requires the development of the Local Plan options including reasonable alternatives, however, the 'Potential Spatial Scenarios' set out in the Local Plan are not discussed or assessed in the SA, despite the reference made in the Local Plan to the SA (**Local Plan para 5.32, page 53**). Instead the SA considers 'Potential Distribution Options' (**SA para 5.27-5.41**), which sets out the 6 Potential Growth Options identified in the Plan.

2.15 The SA sets out the different housing need figures that have been considered in the Local Plan (Options A-G), of which options B & C have been discarded. However, the SA has not tested the implications of other options, including the estimated residual need of between 3,672 and 8,915; a higher housing figure to ensure flexibility; or a mid-point figure. Guidance suggests that the **need** for the development should be assessed first, before deciding on the potential **locations** for such growth.

2.16 **The SA would be strengthened by including an assessment of the 'Potential Spatial Scenarios' as well as different options for housing need.**

#### Potential Garden Communities and Settlement Options

2.17 The second step in the process has been to consider the potential for garden communities and settlement options. This stage in the assessment should come after the **need** has been assessed in order to determine if new communities are required and if so, how many.

2.18 **Paras 5.23-25** do not explain the identified need or capacity of existing settlements and refer the reader to another report, the Settlement Assessment and Settlement Profiles, 2018. The key findings of the study should be explained to show how they have informed the SA and assessment of alternatives. The different types of settlement e.g. autonomous, co-dependent, urban extension etc are also not explained within the SA. The SA should provide an account that is transparent and that can be easily understood by the lay person.

#### Potential Growth Options

2.19 The SA has taken the **6 Local Plan options** as the determining factor in the selection of the assessment of options. The SA should inform the Local Plan not the other way around. In addition, the Local Plan has identified that 3 of the options presented (1, 2 and 4) are not reasonable alternatives. It is not clear why these alternatives were included if they were not considered reasonable.

2.20 **Option 6** also includes **5 sub-options** of potential areas to be considered in transport corridors. It is not clear why these options have been selected or if the option includes all or some of these sub-options. It would have been helpful if each of the transport corridors had undergone a separate assessment so the reader can see how they perform. The emphasis appears to be on the roads with no mention of the rail corridors.

2.21 **It is not clear why the options retained were selected or other options were not considered. The SA should set out the reasons for the selection and rejection of options.**

### Evaluate the likely effects of the Local Plan and alternatives

- 2.22 **Stage B.3** requires the evaluation of the likely effects of the Local Plan and alternatives. The methodology fails to set out the key stages of the SA process as set out in the PPG or explain adequately how the SA fits into the plan making process. Sustainability Appraisal is integral to the development of the local plan and it is therefore important that the SA informs its development.
- 2.23 The Sustainability Report must *'identify, describe and evaluate the likely significant effects on the environment of implementing the plan policies and the reasonable alternatives, taking into account the objectives and geographical scope of the plan.'* (PPG 019).
- 2.24 At **para 6.2** it is stated that the 'likely significant effects are evaluated against the baseline', however no baseline information has been provided within the report.
- 2.25 The methodology differs from the one set out in the Scoping Report 2017 and instead introduces a 'ranking' preference. Unfortunately, the ranking is not explained, in particular which end of the rank is best and also what reasonable assumptions have been made to determine the rank. The results are therefore impossible to interpret and add an unnecessary level of confusion and complication to the assessment.
- 2.26 The SA guidance is clear on the need to use easily understood prediction systems such as - major positive, positive, uncertain, negative, major negative - which are now used as common practice, with a commentary on the reasons for the predicted effect. The guidance also emphasises the difficulties attached to assessments and the need to support results with evidence.
- 2.27 It is also recognised best practice to assess options using the SA framework. It is a lot easier to understand the results if each option is assessed against the framework as a whole rather than assessing by individual objective. A commentary should also be included as part of the matrix. The use of a such a matrix makes it easier to compare the results for different options, an important part of the SA process. A summary table of the results can also be produced more easily. The current format means that the reader has to scroll up and down throughout the entire document to try and understand the results for each option against each separate objective. The summary table does not help the reader to understand the process or the reasons for the results.
- 2.28 The concluding statement (**page 39**) illustrates that the way the SA has been conducted has not helped to inform the decision-making process as the results are inconclusive and the sustainability objectives have not been assigned any weight.
- 2.29 The criteria for determining the likely significance of effects on the environment are set out in Schedule 1 to the Environmental Assessment of Plans and programmes 2004 including the probability, duration, frequency and reversibility of the effects as well as the cumulative nature of effects. Whilst the methodology makes reference to these criteria, it is not clear how they have been applied in the assessment particularly in relation to the cumulative impacts. The use of the criteria would enable more conclusive results.
- 2.30 The evaluation of the effects is not clear, and the format is difficult to follow. The results would be easier to understand if each option was assessed against the SA framework in its entirety rather than assessing each option against individual objectives. The results would be strengthened by using the significance criteria identified in the regulations, including cumulative effects and links to the evidence base.**

## Appendix A: Appraisal of Garden Community Options

- 2.31 It should be noted that the SA states that 3,000 homes or one garden community will be completed in the second phase of development, which equates to 300 not the 500 homes a year stated in the Local Plan (**para 89, page 42**).
- 2.32 A separate Settlement Assessment, 2018 (SBC) and a Strategic Development Site Options Study, December 2019 (AECOM) have been prepared in support of the Local Plan. The purpose of the Strategic Development Site Options Report is set out as follows:  
“to provide a strategic review of opportunities and constraints at a number of locations in the Borough that emerged as options for growth through the recent Stafford Borough Strategic Housing and Employment Land Availability Assessment (SHELAA) exercise, and any others.”
- 2.33 The document provides some of the baseline data particularly maps, which set out the constraints for the area. This information should be set out in the SA in order to understand the assessment.
- 2.34 The results of the SA for the Garden Communities are too generic and do not appear to correspond with the evidence within the Strategic Development Site Options. For example:

### **Air Quality**

It is not clear why the impact on Air quality would be ‘no significant impact’ for all sites given the current lack of information at this point. If new buildings and infrastructure needs to be provided and the population who will use cars in the area is likely to increase, then at least a minor negative impact should be recorded at this point with the potential for mitigation to be provided. Should mitigation measures be identified that can reduce the negative impact in future iterations then the results can be amended accordingly.

### **Biodiversity**

The SA refers to all options being either wholly or partially within the Cannock Chase SAC 15km buffer. Options that are wholly within the buffer area will have a more significant effect than ones that are only partially within the area. No plan is provided to show where the options are located within the buffer zone or information on how the individual options are affected. All sites are scored uncertain but clearly mitigation will be more feasible on some options than others.

### **Climate Change Mitigation**

All sites are assumed to have no significant impact in relation to Climate Change Mitigation. Given the quantum of development proposed and the uncertainty of the measures to be introduced to mitigate such impacts, an uncertain impact or negative impact is more likely. There is also no discussion of utilities provision and the current capacity issues for any of the options.

### **Economy and Employment**

Whilst the objective is supposed to include education as well as employment, there is no discussion on the current capacity or need for additional educational provision. This omission highlights the issue of incorporating too many issues within one objective. There is also no consideration of current employment provision in relation to each option.

### **Land, Soils and Waste**

The range of issues covered by this objective shows that it would be very difficult to differentiate between whether a site has been discounted because of land use, minerals or waste issues. The issues should be separated into individual objectives so it is easier to see how the different options perform.

**Population and Communities**

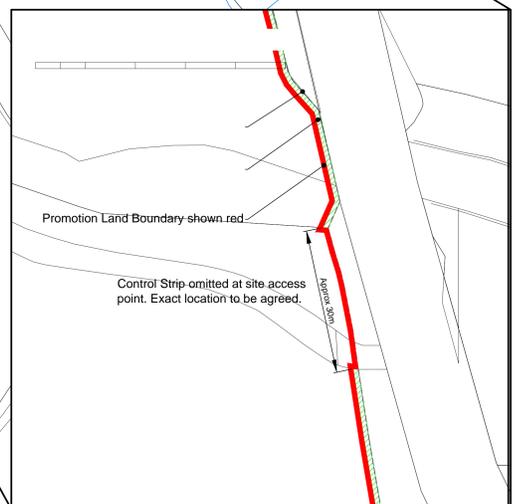
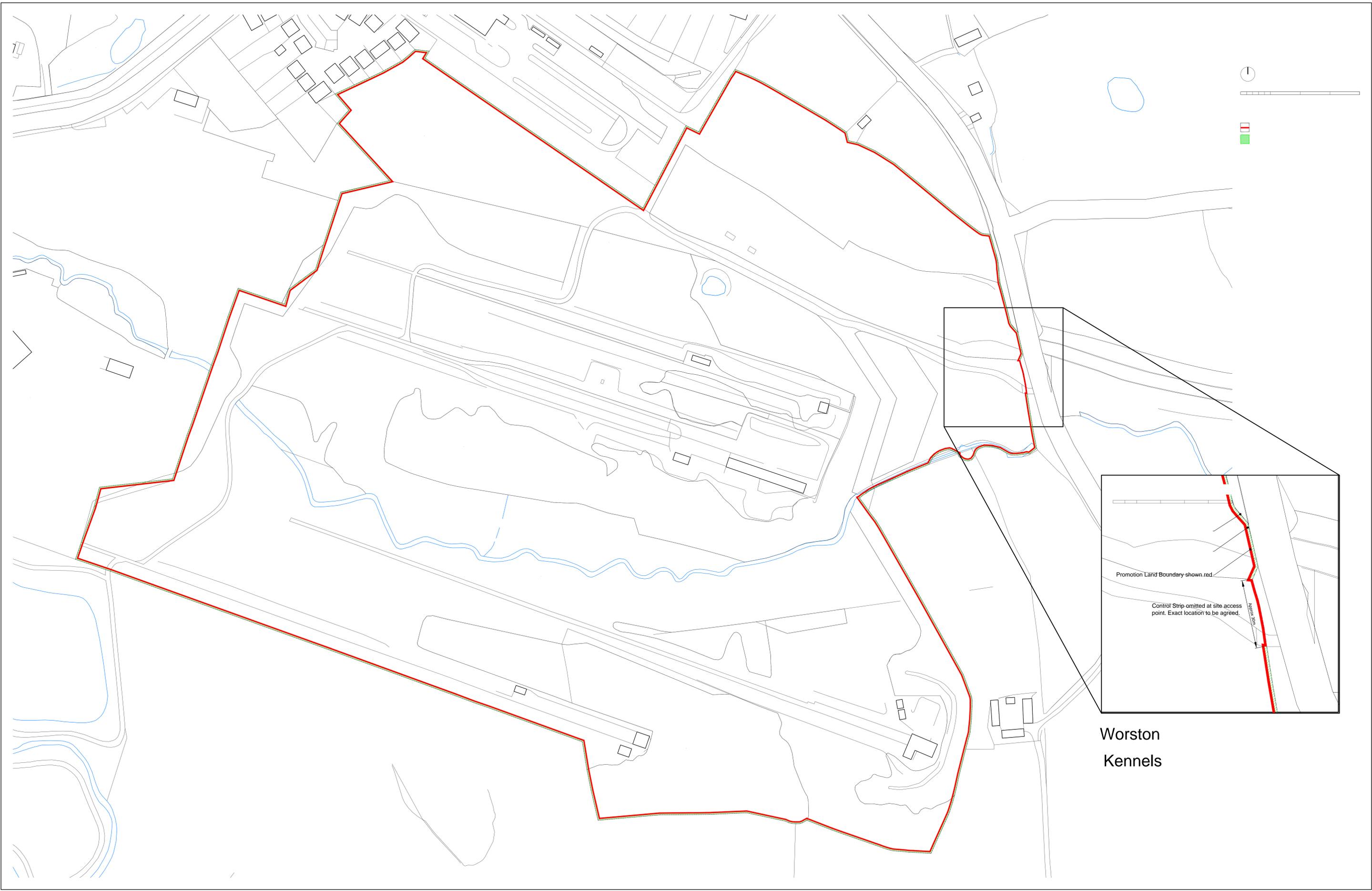
The objective covers a broad range of issues for consideration regarding community infrastructure, but the SA focusses upon green infrastructure provision. The impact of the options on existing settlements and facilities is not discussed.

**Transport**

All options are considered to have no significant effect upon transport. Given the new infrastructure provision that would be needed for the options to be delivered this conclusion is considered to be unrealistic. It is also not known whether the infrastructure requirements are viable or deliverable at this stage. It should be clear what infrastructure is needed for each option and what information will be required to support future iterations of the Plan and SA.

- 2.34 The results of the SA for the Garden Communities are too generic and do not appear to correspond with the evidence base. Any uncertainties or gaps in the information should be identified so that the issues can be addressed in future iterations of the Plan and SA and more definitive conclusions can be made.**

# **APPENDIX II**



Worston  
Kennels

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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>		
<b>First Name</b>		<b>Chontell</b>
<b>Surname</b>		<b>Buchanan</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Planning Consultant</b>
<b>Organisation (if applicable)</b>		
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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](mailto: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](http://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 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-](http://www.staffordbc.gov.uk/new-local-plan-)

Please e-mail your comments (Preferred) to: [forwardplanning@staffordbc.gov.uk](mailto: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](http://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](mailto:forwardplanningconsultations@staffordbc.gov.uk)

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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>		
<b>First Name</b>		<b>Chontell</b>
<b>Surname</b>		<b>Buchanan</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Planning Consultant</b>
<b>Organisation (if applicable)</b>	<b>The Trustees of the Community of St Mary’s Abbey</b>	<b>First City Limited</b>
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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.

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**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.

<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b>		<b>Organisation</b>			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>3A 3B &amp; 3C</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>3.A. Do you agree that the Vision should change?</b></p> <p><b>3.B. Do you agree that the Vision should be shorter?</b></p> <p><b>3.C. 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?</b></p> <p>The vision and strategic objectives in the current plan up to 2031 concentrated heavily on the role of Stafford Town and Stone. However, the shorter, streamlined proposed vision for the Borough we agree with in general.</p> <p>The visions and objectives as set out in Figure 3.1 provide a number of broad priorities for the Borough as a whole with more emphasis on climate change.</p> <p>In order for climate change to be given a higher level of consideration we consider it is important to acknowledge the roles of settlements outside of Stafford Town and Stone.</p> <p>In connection to the large settlements excluding Stafford Town and Stone, we consider it is important to acknowledge the important role they play in the vitality and community of the Borough.</p> <p>Settlements such as Little Haywood and Colwich, play an important role of providing services and facilities to the surrounding rural area and provide its own role in supporting the social and economic need of Stafford Borough. It is important that settlements such as theses are able to be flexible and adapt and therefore allowing additional housing to meet the needs of the local community who wish to remain in the settlement and those whom would like to reside in a settlement smaller than Stafford Town or Stone.</p> <p>It is important settlements such as Little Haywood and Colwich are given the opportunity to grow and adapted in line with modern times in order to remain sustainable but with consideration given to the important history of the settlements.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	

Figure		Question		Other	
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<b>Figure</b>		<b>Question</b>	<b>3D 3E &amp; 3F</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>3.D. Should the spatially-based approach to the Objectives be retained? Does this spatially-based approach lead to duplication?</b></p> <p><b>3.E. Is the overall number of Objectives about right?</b></p> <p><b>3.F. Should there be additional Objectives to cover thematic issues? If so what should these themes be?</b></p> <p>For settlements outside of Stafford and Stone, the key objectives state:</p> <p><i>21. Provide for high quality new small scale housing development at appropriate villages that reflects their distinctive local character</i></p> <p><i>22. Deliver sensitive additional facilities to provide an improved level of local services appropriate to settlements, that reduces the need to travel and is in keeping with the local character, the historic environment and the rural setting</i></p> <p><i>23. Provide increased rural employment through agricultural and livestock businesses, renewable energy schemes, low impact hi-tech industries in agricultural buildings and sensitive new tourist attractions that enhance the high quality environment of the area</i></p> <p><i>24. Deliver new employment land through the expansion of existing industrial areas</i></p> <p><i>25. Provide new high quality homes, including new affordable homes, on appropriate sites in existing villages, to support sustainable rural communities in the future</i></p> <p><i>26. Support increased habitat maintenance, restoration and creation, and the encouragement of a diverse range of species as part of the strategic green infrastructure network across the Stafford Borough area, whilst also protecting designated sites, including the Special Areas of Conservation</i></p> <p><i>27. New open space, sport and recreational facilities to meet the needs of the community, including through increased multi-use provision such as community halls</i></p> <p><i>28. Encourage the sustainable management of heritage assets, especially those identified as at risk, and deliver development which respects local character and distinctiveness</i></p> <p>We do consider these should be considered as high-level objectives and a degree of planning judgement needs to be applied based on the varying characteristics and size of each settlement in the Borough.</p> <p>In connection to the large settlements excluding Stafford Town and Stone, we consider it is important to acknowledge the important role they play in the vitality and community of the Borough.</p> <p>Settlements such as Little Haywood and Colwich, play an important role of providing services and facilities to the surrounding rural area and provide its own role in supporting the social and</p>					

economic need of Stafford Borough. It is important that settlements such as these are able to be flexible and adapt and therefore allowing additional housing to meet the needs of the local community who wish to remain in the settlement and those whom would like to reside in a settlement smaller than Stafford Town or Stone.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>		<b>Other</b>	

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<b>Surname</b>		<b>Buchanan</b>
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<b>Part B: Your Comments</b>					
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<b>Name</b>		<b>Organisation</b>			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>	<b>4: Sustainability and Climate Change</b>	<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>4A 4b 4C 4D 4E</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b><i>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.</i></b></p> <p><b><i>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?</i></b></p> <p><b><i>b) What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?</i></b></p> <p><b><i>4.B. Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?</i></b></p> <p><b><i>4.C. Should the council introduce a policy requiring large developments to source a certain percentage of their energy supply from on-site renewables?</i></b></p> <p><b><i>4.D. Should the council allocate sites for wind energy developments in the Local Plan? If so, where should they be located?</i></b></p> <p><b><i>4.E. Should the council implement a higher water standard than is specified in the statutory Building Regulations?</i></b></p> <p>We acknowledge and support the requirement for climate change to be identified as a key objective in the Local plan Review for up to 2040. Building regulations are updated regularly as a result of changes to legislation, government guidance, updates in evidence and technology. We anticipate over the plan period (2020-2040), building regulation will continue to change and be updated and therefore any standards advised in the Local Plan Review would become out of date on the emergence of new guidance.</p> <p>We therefore consider it would be more appropriate to set minimum standard which are the current requirements with reference to the need to follow up to date guidance, where necessary and appropriate to do so, which would be imposed on planning permissions granted at the time.</p>					

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<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
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<b>Section</b>	<b>5: The Development Strategy</b>	<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5B</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>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></p> <p><b>b) Should a Partial Catch Up rate allowance be incorporated?</b></p>					
<p>We consider it is important and necessary to apply an aspirational yet realistic annual housing requirement to the Local Plan Review to cover the period 2020 to 2040.</p> <p>There is a desire to boost job creation and the economy in the Borough and therefore a future housing need should accommodate the anticipated economic output.</p> <p>It is widely publicised that England and the Midland region, are in need of more housing. It is also important to note the current Plan for Stafford Borough 2011-2031 requires 500 dpa to be delivered and therefore, as a starting point, any future Local Plans should exceed the dpa of the previous plan as national evidence indicates the population will continue to rise.</p> <p>The Stafford Borough Authority Annual Monitoring Report 2019 table 4.1 Housing Delivery 2011-2018 (dwellings) indicated that during the time period the average housing number delivered was 604. In 2016/17, the number of houses delivered was 1,010. Therefore, based on the housing delivery experienced and required up to 2040, scenarios E, F and G should be examined further.</p> <p>It is important to acknowledge recent economic downturns and the demographics of the population that this impacted on. <i>“Starting post-2017, headship rates amongst 15-34 year olds are projected to make up 50% of the difference of long term trends. These age groups were most significantly impacted during the recession as a result of tougher deposit requirements and falling relative incomes. As the Sub National Household Projections (SNHP) draws on past trends, this results in household formation rates continuing to be suppressed going forward, locking in patterns of low household formation rates for particular age cohorts”.</i></p> <p>Therefore, this further supports the requirement for further housing numbers in excess of the current plan. This should be acknowledged, and the housing needs of the Borough adjusted accordingly to include a Partial Catch Up rate. This should also be acknowledged in the distribution of dwellings throughout the Borough in addition to the quantity.</p>					

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<b>Figure</b>		<b>Question</b>	<b>5C</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>5.C</b>  <i>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?</i>  <i>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)?</i></p> <p>It is important that double counting doesn't occur as that will give a false account of the current housing numbers and therefore have an impact on accurate future need figures.</p> <p>However, it is important that only completions or sites which are near completion are discounted. It is important for the Council to ensure a buffer housing requirement is provided and not rely solely on site committed by the adopted Local Plan, Stage 2 site allocations and Neighbourhood plans or sites with planning permission as that is not a guarantee that those site will come forward and deliver housing within a timely manner within the plan period.</p>					

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<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
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### **NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS**

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<b>Surname</b>		<b>Buchanan</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Planning Consultant</b>
<b>Organisation (if applicable)</b>	<b>The Trustees of the Community of St Mary’s Abbey</b>	<b>First City Limited</b>
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<b>Figure</b>		<b>Question</b>	<b>5D</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<b>5.D</b>					
<i><b>i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?</b></i>					
<i><b>ii. Do you agree that the smaller settlements should be included in the Settlement Hierarchy?</b></i>					
<p>There is a need for development to ensure natural growth and maintain and even enhance sustainability of these settlements. As stated within the Issue and Options Consultation document the settlements below Stafford Town and Stone, settlements such as Little Haywood and Colwich, play an important role of providing services and facilities to the surrounding rural area and provide its own role in supporting the social and economic need of Stafford Borough. It is important that settlements such as these are able to be flexible and adapt and therefore allowing additional housing to meet the needs of the local community who wish to remain in the settlement and those whom would like to reside in a settlement smaller than Stafford Town or Stone.</p> <p>It is important settlements such as Little Haywood and Colwich are given the opportunity to grow and adapted in line with modern times in order to remain sustainable but with consideration given to the important history of the settlements.</p> <p>We do not consider the smaller settlements such as Adbaston; Aston-by-Stone; Bradley; Cold Meece; Cotes Heath; Creswell; Croxton; Hopton; Milwich; Moreton; Norbury; Norton Bridge; Ranton; Sandon; Salt and Seighford should result in housing being diverted away from the 4<sup>th</sup> tier large settlements such as Little Haywood and Colwich who have a greater number of services available to support increased growth.</p>					

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<b>Figure</b>		<b>Question</b>	<b>5F</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<b>5.F</b>					
<p><b>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></p> <p><b>b) Are there any of these spatial scenarios that you feel we should avoid? If so, why?</b></p> <p><b>c) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer</b></p>					
<p>In providing the potential spatial scenarios we consider it is important for the consultation document to clearly set out the settlements that would be impacted by the proposed scenario and should use the same categorisations as in the settlement hierarchy.</p> <p>For example, " Dispersal of development - This would involve spreading new development across the Borough including in smaller settlements";  "String" settlement/settlement cluster - where development is focussed on a number of linked settlements. It could involve new and/or existing and/or expanded settlements"  "Wheel" settlement cluster - focus on Stafford and surrounding settlements"</p> <p>What settlements are considered to be smaller settlements? do this include all the settlements below Stafford Town and Stone (Tier 4,5 and 6) in the settlement hierarchy as set out in Table 5.4, page 48 and 49 of the Issues and Options consultation document?  What settlements are considered to be linked settlements?  What settlements are considered to be surrounding settlements of Stafford? How far and extent does this go?</p> <p>Example scenarios and the types of settlements that fall under each scenario should be set out in the consultation document alongside the questions for clear transparency for interested parties and not set out in the accompanying evidence base documents.</p> <p>With that being said, we support the potential scenario that promotes additional development in the tier 4 larger settlements in the hierarchy. We therefore support the following scenarios: Dispersal of Development, Intensification around the edge of larger settlements and strategic extensions where an increased level of distribution is directed towards the tier 4 larger settlement.</p> <p>This would align we trends which have emerged during the current plan period where an increased level of development has been experienced in the Key Service Villages which includes the larger (tier 4) settlements which has shown that there is a desire for new houses in these areas. Therefore, growth that is planned for via the Local Plan would ensure the necessary infrastructure can grow</p>					

alongside other proposed development and ensure development is located in the most suitable locations instead of ad-hoc development.

Little Haywood and Colwich are identified as large (tier 4) settlements and has a significant array of services and facilities that can accommodate additional housing, which in turn would ensure the sustainability and vitality of the area for current and future residents to come.

We therefore support the allocation of increased development in Little Haywood and Colwich.

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Section	Paragraph	Table
Figure	Question	Other

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<b>2. Please set out your comments below</b>					
<p><b>5.G.</b>  <i>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.</i></p> <p><b>5.I.</b>  <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.</i></p> <p><b>5.J.</b>  <i>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</i></p> <p>We do not consider it is appropriate and justified to investigate the creation of a Garden Community prior to the growth potential of existing settlements being examined in the first instance. We consider it is preferable to extend existing infrastructure on the edge of existing settlements as opposed to the creation of a new settlement which will take many years to come to fruition. We therefore consider additional development should be directed to existing settlement such as Little Haywood and Colwich and the development boundaries of these settlements amended to include land for residential development. We consider the current allocations on land such as Green Spaces should be investigated and altered in the most sustainable locations to ensure residential development is located in the most appropriate places and new areas of green infrastructure which have a meaningful use adjacent to the countryside are consider in alternative locations.</p> <p>We consider proposals which encourage dispersed development in the larger tier 4 settlements should be promoted. As stated in paragraph 5.44, some of the larger settlements (tier 4) experienced high levels of growth during the plan for Stafford Borough 2011-2031.This therefore</p>					

indicates a desire for increased residential development in these areas and therefore an appropriate level of development should be identified in the Local Plan Review.

Of the 6 growth scenarios set out in paragraph 5.36 of the consultation document, we lend our support mostly to Growth Options 3 and 6. Nevertheless, in connection to Growth option 3, Disperse development across the new settlement hierarchy, we are supportive of development in the tier 4 developments, however, we do not consider the medium and small settlements should have a combined total of up to 20% of the distributed growth which would be equal to that of the Large Settlements. The large settlements have a greater level of services and facilities and in turn are a more sustainable settlements therefore should be allocated a higher percentage of growth. We consider the medium and small settlements should have a combined growth of 15% and the Large settlements should have up to 25%.

In connection to Growth Option 6: concentrate development within existing transport corridors/ clusters of communities. We support development directed towards the A51 (Stone- Weston-Hixon- Great Haywood- Little Haywood.

We consider the inclusion of a Partial Catch Up would be positive and do not support the inclusion of a Garden Community or a discount should be applied.

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<b>Figure</b>		<b>Question</b>	<b>50</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<b>5.0</b>					
<i>Are there any additional sites over and above those considered by the SHELAA that should be considered for development?</i>					
<i>If so please provide details via a “Call for Sites” form?</i>					
<p>We support development within Little Haywood in the Local Plan Review and consider the most appropriate and sustainable location is Site ID COL14.</p> <p>It is within close proximity to the services and facilities within the settlement and would prevent development sprawl which would be the result of development elsewhere on the edge of the settlement.</p> <p>Site ID COL14 should be considered in greater detail and the development boundary for Little Haywood amended to include the site.</p>					

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<b>Part B: Your Comments</b>					
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<b>Name</b>		<b>Organisation</b>			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5Q</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>5.Q. Do you agree with the methodology used to define settlement boundaries? If not please provide reasons for your response.</b></p> <p>We consider it is important to review settlement boundaries in an objective manner during the Local Plan Review process and prevent existing development boundaries being repeated purely due to a continuation of the status quo.</p> <p>In regards to the methodology set out in Stages 1-3 and the Development Principles 1-3 in paragraphs 5.91-5.98 of the Issues and Options Consultation document. Paragraph 5.95 states "<i>settlement boundaries exclude open areas of land (public open space, allotments, school playing fields) on the edge of settlements unless appropriate for general development</i>".</p> <p>We do not support the exclusion of open areas of land on the edge settlements from being included within the development boundary as the exclusion of the sites from within the development boundary by default renders the site contrary to planning policy and therefore unsuitable for development.</p> <p>We consider the land to the east of St Mary's Abbey in Little Haywood is an example of this. The site is suitable for residential development and located centrally within the settlement and in a highly sustainable location and therefore the development boundary should be amended to include this parcel of land in addition to the Abbey and its grounds. The railway line would create an obvious permanent, physical boundary to Little Haywood, which we consider is appropriate and sustainable.</p>					

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<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
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<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>		
<b>First Name</b>		<b>Chontell</b>
<b>Surname</b>		<b>Buchanan</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Planning Consultant</b>
<b>Organisation (if applicable)</b>	<b>The Trustees of the Community of St Mary’s Abbey</b>	<b>First City Limited</b>
<b>Address</b>		
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<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b>		<b>Organisation</b>			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>	<b>8: Delivering Housing</b>	<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8A-8O</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>8.A.</b> <i>Should the council continue to encourage the development of brownfield land over greenfield land?</i></p> <p><b>8.B.</b> <i>Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough?</i> <i>If so, do you consider:</i> <i>the implementation of a blanket density threshold; or</i> <i>a range of density thresholds reflective of the character of the local areas to be preferable?</i> <i>Why do you think this?</i></p> <p><b>8.C.</b> <i>Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?</i></p> <p><b>8.D.</b> <i>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?</i></p> <p><b>8.E.</b> <i>In the New Local Plan should the Council</i> <i>a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings?</i> <i>b) Only apply the Nationally Described Space Standards to new build dwellings?</i> <i>c) Not apply the Nationally Described Space Standards to any development?</i> <i>Please explain your answer.</i></p> <p><b>8.F.</b> <i>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?</i></p> <p><b>8.G.</b> <i>Do you consider the lack of smaller housing units to be an issue within the Borough of Stafford?</i> <i>If so, are there any areas where this is a particular problem?</i></p> <p><b>8.I.</b> <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?</i></p>					

**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?**

**8.J.**

**Do you consider that there is no need for additional provision of student accommodation within the Borough?**

**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?**

**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?**

**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?**

**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?**

**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?**

We support the encouragement of the redevelopment of brownfield land in the Local Plan Review; however, it is important that the Council acknowledge that there is a limited amount of brownfield land that will come forward. Lots of brownfield land has many constraints whether that being long term effects as a result of previous uses i.e., contamination; or located in inappropriate locations for future residential development (where people would not want to live or away from local service and facilities and an existing community nearby) which in turn make the development undesirable and unsustainable or the sheer quantity of brownfield land is insufficient to enable a positive contribution to the housing provision in areas outside of Stafford Town or Stone for example.

We therefore consider it is important that the Council are realistic in its approach to the delivery of residential development on brownfield land. With a particular focus on the tier 4 settlements in the Settlement Hierarchy, development should be focused on the reuse/ conversion of existing buildings and the allocation of sites in the post sustainable locations regardless of whether they are brownfield or greenfield sites.

Density: It is important for sites to be assessed on their own merits and therefore a broad minimum density for the whole Borough might be suitable as a starting point as guidance for future developments but it is important for developments to consider the site itself, its surroundings and the settlement in which it relates to.

In regards to the housing standards of new dwellings including conversion of existing buildings it is important that the individual circumstances of the site and building are considered on its own merit in addition to the location of the development in terms of the settlement it is positioned, the housing needs of the area and the market conditions.

Some locations and the developments that take place are guided by their current needs and the likely end occupier, which in turn dictates the amount of space potentially required per property.

In connection to conversions, there is the need for a balance of the reuse of a building that would potentially otherwise become derelict if an alternative use is not found and the viability of converting the building and any other considerations that might apply, such as the building being listed. A general space standard applied across the board would be detrimental to the reuse of sustainable development.

In regards to a housing mix policy, again we consider it is useful to have a guild in connection to the types and sizes of dwellings but this may be better suited to a following supplementary guidance document as opposed to being identified within the adopted Local Plan Review which is to cover a 20 year period. There could be significant changes to the population, migration changes, economic changes and household number patterns during the plan period which could rapidly render the policy out of date.

We consider developments should be mindful of the need to provide a range of house types (housing mix) to meet the needs of different groups within the community, however, a level of planning judgement needs to be applied to each individual case ensuring each development is slightly unique and appropriate for the site and its location. Imposing a housing mix could have a negative restrictive effect on design and character of developments.

We do not consider that the Council should include a policy requiring bungalows to be delivered on all major developments. Bungalow developments are not appropriate in all locations and therefore a Borough wide policy would be detrimental to some development sites coming forward. There is a requirement for developments to take into consideration the character and location of the site and it is also important to encourage a level of individuality and character to be included in the design of future developments. By the inclusion of too many policies dictating the type, tenure, size and quantity of dwellings on every development there is the risk of a lack of individuality and a lack of consideration given to the surrounding character. The type of development that is suitable in the centre of Stafford Town would not necessarily be suitable on the edge of a tier 4,5 or 6 settlement for example in both the housing types, layout design, parking provision, garden sizes and area of open space. There has to be an element of individuality applied to development proposal to avoid every development being identical which would not appeal to everyone and would not be suitable in rural/urban or large/small development.

We do not support the inclusion of a policy which stipulates all major developments should deliver bungalows.

In connection to self and custom build housing, we do not consider it is appropriate to impose a requirement for sites to provide self-build plots. Not all locations are suitable or desirable to self-builders and therefore, again, imposing such a policy on developments reduces the ability to encourage individuality and developments which are appropriate to the location and surrounding character. We do not consider this approach should be applied to the larger or smaller settlements for the reasons outlined.

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	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>		
<b>First Name</b>		<b>Chontell</b>
<b>Surname</b>		<b>Buchanan</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Planning Consultant</b>
<b>Organisation (if applicable)</b>	<b>The Trustees of the Community of St Mary’s Abbey</b>	<b>First City Limited</b>
<b>Address</b>		
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<b>Name</b>		<b>Organisation</b>			
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<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8H</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>8.H.</b>  <b><i>Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?</i></b></p> <p>It is undeniable that there is a growing population UK wide and this trend followings in the Stafford Borough.</p> <p>Paragraphs 8.21 and 8.22 of the Issues and Option consultation document states, <i>“The population of older people within Stafford Borough is projected to increase by 34.7% in the next 20 years. This increasing population suggests an increased provision of specialist accommodation will be required. There are a variety of types of housing which can support the older residents of the Borough, for example; care homes and extra care facilities.</i></p> <p><i>To meet the housing needs of Stafford Borough’s older population, the new Local Plan must employ measures to increase the supply of care facilities. This is reflected in the Economic &amp; Housing Development Needs Assessment (EDHNA), which suggests that, when combined, there will be a need for an additional 1,111 care home spaces and extra care and sheltered housing units across the Borough.”</i></p> <p>The suggestion of a policy that requires 10% of affordable dwellings on site that is adaptable to be wheelchair accessible would naturally lend itself to bungalows and apartments to ensure the properties are fully wheelchair accessible, but would also be more than appropriate in two story houses with the correct adaptations.</p> <p>There is no doubt that as a country we need more housing to be constructed suitable for an ageing population.</p> <p>However, again the potential viability impacts of this on the scheme need to be considered a degree of flexibility shown on a case by case scenario taking into consideration the location of the scheme and its intended occupants in addition to other potential factors.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
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<b>Title</b>		
<b>First Name</b>		<b>Chontell</b>
<b>Surname</b>		<b>Buchanan</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Planning Consultant</b>
<b>Organisation (if applicable)</b>	<b>The Trustees of the Community of St Mary’s Abbey</b>	<b>First City Limited</b>
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Name		Organisation			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>	<b>9: Delivering Quality Development</b>	<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9A-9O</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>9.A. <b>Should the Council</b></p> <p><i>a. Have a separate policy that addresses Green and Blue Infrastructure?</i></p> <p><i>b. Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?</i></p> <p>9.B. <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?</b></p> <p>9.C. <b>Should the New Local Plan:</b></p> <p><i>a) Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate;</i></p> <p><i>b) Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement;</i></p> <p><i>c) Require, through policy, increased long term monitoring of biodiversity mitigation and enhancement measures on development sites</i></p> <p><b>9.D. How should Plan Policies have regard to the new AONB Management Plan and Design Guidance?</b></p> <p>9.E. <b>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?</b></p> <p>9.F. <b>Question 9.F</b></p> <p><b>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.</b></p> <p><b>If yes, are the following measures appropriate?</b></p> <p><i>a) Protecting and enhancing allotments, community gardens and woodland;</i></p> <p><i>b) Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites;</i></p> <p><i>c) Requiring major residential developments to incorporate edible planting and growing spaces;</i></p> <p><i>d) Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities.</i></p> <p>9.G</p>					

**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?**

**9.H**

**Do you consider there are areas in the Borough that should have the designation of Special Landscape Area?**

**If so, please explain where.**

**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.**

**9.J.**

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

**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?**

**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?**

**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.**

**9.M.**

**Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?**

**9.N.**

**a. Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so where?**

**b. Are there any other Borough-wide facilities you feel should be associated with open space?**

**c. Are there any settlements that you believe are lacking in any open space provision?**

**d. Should the Council seek to apply Play England standards to new housing developments?**

**e. Should the Council seek to apply Fields in Trust standard to providing sports and children’s facilities?**

- f. Should the Council seek to apply Natural England's ANGSt to new development?**
- g. Should the Council seek to develop a bespoke standard in relation to open and/or play space?**
- 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)?**
- i. Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure?**
- j. Should the Council require all high density schemes to provide communal garden space?**

**9.O.**

**Should the Council:**

- a. Seek to designate land within the New Local Plan 2020-2040 to address the Borough-wide shortage of new sporting facilities?**
- b. Identify within the New Local Plan 2020-2040 the site in which a new swimming pool should be developed?**

We understand and recognise the importance of Green and Blue infrastructure. We consider it is important that current areas that are considered green or blue infrastructure are assessed to determine if they can be better use of the site for an alternative use. A sites current designation should not necessarily mean the site has to stay in that use in the future. The Local Plan Review is the optimal opportunity to review sites and potentially allocate sites designated as Green Infrastructure but would be better suited for alternative use such as residential and to allocate additional sites elsewhere as Green Infrastructure.

We do not consider the New Local Plan should protect all designated site from development and include any buffer zones. As stated above, not all sites with current designations meet the criteria of their designation and should be reassessed. Some parcels of land currently designated as Green Infrastructure, such as St Marys Abbey and the land to the east of St Mary's Abbey, Little Haywood would be better suited for residential development due to its highly sustainable location. Any development on that site has the potential to benefit from enhanced landscaping which would arise as a result of a development scheme on the site. This would therefore have significant environmental and biodiversity enhancements over and above its current condition. This site should therefore be allocated for residential development to help meet the housing needs of Little Haywood in a sustainable location but also improve the biodiversity of the area.

We do not consider there is a requirement for a specific policy relating to the protection of trees. If a tree is deemed to be of substantial merit it will be preserved via a Tree Preservation Order.

We do not consider it is appropriate to include a policy that requires new developments to take an active role in securing new food growing spaces. It would not always be practical and possible for developments, including major residential developments to incorporate edible planting and growing spaces. The quality of land required for optimum growth of food would not necessarily be found on sites suitable for development and often require large areas of land to ensure appropriate separation distances and drainage can be achieved for large quantities of produce to support the residential development. This would therefore reduce the amount of developable area. Thus, resulting in increased encroachment into the countryside to meet the housing needs of the Borough.

We consider it is important to consider the Character Area and quality of the landscape setting, however, we consider the Council should refrain from the inclusion of overly

restrictive policies that could potentially prohibit or deter otherwise sustainable development. This would be contrary to National Planning Policy.

In regards to the Historic environment again, we understand and recognise the importance of heritage assets and their meaning to their immediate setting and in some cases the Borough as a whole. However, just as each Heritage asset is different, we **do not** consider having 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;
- Take a broader and more inclusive approach by explicitly encouraging the recognition of currently undesignated heritage assets, settlement morphology, landscape and sight lines;
- 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;
- Encourage the maximisation of the wider benefit of historic assets by their incorporation into development schemes through imaginative design.
- Or consider historic places and assets in the context of climate change permitting appropriate adaptation and mitigation measures.

Is the appropriate approach.

Each heritage asset should be judged on its individual merits on a case by case scenario when put in context the heritage asset itself, its surrounding landscape and the proposed development which relates to the heritage asset. Chapter 16, conserving and enhancing the historic environment, paragraphs 184 – 202 of the National Planning Policy Framework (NPPF) provides sufficient protection to heritage assets.

Any further broader inclusive policies set out in the New Local Plan would not assist with protecting, promoting and enhancing heritage assets in the correct way.

In regards to design of developments, as previously stated one set design rule is not appropriate in all locations and therefore a Borough wide policy would be detrimental to some development sites coming forward. There is a requirement for developments to take into consideration the character and location of the site and it is also important to encourage a level of individuality and character to be included in the design of future developments. By the inclusion of too many policies dictating the type, tenure, size, quantity of dwellings and requiring complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, on every development there is the risk of a lack of individuality and a lack of consideration given to the surrounding character.

The type of development that is suitable in the centre of Stafford Town would not necessarily be suitable on the edge of a tier 4,5 or 6 settlement for example in both the housing types, layout design, parking provision, garden sizes and area of open space. There has to be an element of individuality applied to development proposal to avoid every development being identical which would not appeal to everyone and would not be suitable in rural/urban or large/small development.

Currently, in addition to the Plan for Stafford Borough and Plan for Stafford Borough Part 2 there are Neighbourhood Plans, Supplementary Planning Guidance and Conservation Area Appraisals where applicable all of which provide a level of design guidance which is specific to Stafford Borough and more specific to certain areas. We consider this format provides an appropriate level of guidance as a starting point for developers to carry out local engagement and pre-application discussions with the Council.

In connection to self and custom build housing, we do not consider it is appropriate to impose a requirement for sites to provide self-build plots. Not all locations are suitable or desirable to self-builders and therefore, again, imposing such a policy on developments reduces the ability to encourage individuality and developments which are appropriate to the location and surrounding character. We do not consider this approach should be applied to the larger or smaller settlements for the reasons outlined.

In relation to the designation of Local Green Space, as previously stated, a sites' current designation should not necessarily mean the site has to stay in that use in the future. The Local Plan Review is a perfect opportunity to review sites and potentially allocate sites designated as Green Infrastructure but would be better suited for alternative use such as housing and to allocate additional sites elsewhere as Green Infrastructure including sites as Local Green Space. However, it may be more appropriate to allow the allocation of Local Green Spaces to be left to Neighbourhood Plans.

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>		<b>Other</b>
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**NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS**

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	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>		
<b>First Name</b>		<b>Chontell</b>
<b>Surname</b>		<b>Buchanan</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Planning Consultant</b>
<b>Organisation (if applicable)</b>	<b>The Trustees of the Community of St Mary’s Abbey</b>	<b>First City Limited</b>
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b>		<b>Organisation</b>			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>	<b>10: Environmental Quality</b>	<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>10A – 10C</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>10.A.</b>  <i>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;</i></p> <p><i>a) Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development?</i></p> <p><i>b) Ensure all major development is accessible by regular public transport?</i></p> <p><i>c) Enforce Air Quality Management Zones around areas of notable biodiversity importance?</i></p> <p><i>d) Employ any further methods which you consider will aid in the improvement of air quality within the borough?</i></p> <p><b>10.B.</b>  <i>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?</i></p> <p><b>10.C.</b>  <i>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;</i></p> <p><i>a) Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site?</i></p> <p><i>b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?</i></p> <p><i>c) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford borough?</i></p> <p>We consider it is important for the appropriate balance to be reached in meeting up to date Environmental Qualities standards. Although we recognise the importance of air quality standards, waste management and climate change we consider it is important to ensure that development are deliverable, viable and in places which people wish to live.</p>					

There are standards set in relation to air quality which are referred to by Air Quality specialist consultants when preparing the appropriate supporting application documents which are also considered and assessed by the Council’s Environmental Health and Air Quality consultants as part of the statutory consultee process to planning applications so the necessary current thresholds should already be being adhered to.

It is often seen as part of planning conditions, the requirement for developers to prepare a waste management statement and it is inevitable that as more and more cars become electric vehicles and with the Government wishing to phase out diesel and petrol vehicles being brought forward to 2035, it is inevitable that this will become a standard part of future housing schemes and no doubt will become a critical part of building regulations and therefore we do not consider it is necessary to incorporate these policies into the local plan.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>		<b>Other</b>	

**2. Please set out your comments below**

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	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>		
<b>First Name</b>		<b>Chontell</b>
<b>Surname</b>		<b>Buchanan</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Planning Consultant</b>
<b>Organisation (if applicable)</b>	<b>The Trustees of the Community of St Mary’s Abbey</b>	<b>First City Limited</b>
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b>		<b>Organisation</b>			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>	<b>11: Health and Wellbeing</b>	<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>11A, 11B</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>11.A.</b></p> <p><b>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?</b></p> <p><b>b. Or should an alternative approach to the integration of health and well-being issues into the New Stafford Borough Local Plan be adopted?</b></p> <p><b>c. Where should references to Health and Wellbeing be strengthened in the New Stafford Borough Local Plan?</b></p> <p><b>11.B.</b></p> <p><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)</b></p> <p><b>What is your reasoning for this answer?</b></p> <p>We do not consider there is the need for any additional polices to be introduced into the Local Plan Review in connection to Health and Wellbeing as we consider the current standards far exceed what is necessary.</p> <p>We do not consider it is necessary for the inclusion of any of the flowing potential models as set out in paragraph 11.10 of the Issues and Options Consultation document which include:</p> <p><i>“A. A new specific policy for health and well-being is prepared which clearly identifies key principles for health improvement across developments and links up the cross-cutting themes with other relevant policies in the Local Plan.</i></p> <p><i>B. A new specific policy for health and wellbeing is prepared which clearly identifies key principles for health improvement across developments and, at the same time, identifies new health and wellbeing requirements such as:</i></p> <p><i>I. Full Health Impact Assessments to be conducted on large developments, and Community Impact Assessments to be conducted on small developments</i></p> <p><i>II. Exclusion zones to be placed around schools to prevent new hot food takeaways opening.</i></p> <p><i>C. Specific new health and wellbeing requirements to be placed in revised policy such as:</i></p> <p><i>I. Full Health Impact Assessments to be conducted on large developments, and Community Impact Assessments to be conducted on small developments</i></p> <p><i>II. Exclusion zones to be placed around schools to prevent new hot food takeaways opening”</i></p>					

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

Section		Paragraph		Table	
Figure		Question		Other	
<b>2. Please set out your comments below</b>					

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	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>		
<b>First Name</b>		<b>Chontell</b>
<b>Surname</b>		<b>Buchanan</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Planning Consultant</b>
<b>Organisation (if applicable)</b>	<b>The Trustees of the Community of St Mary’s Abbey</b>	<b>First City Limited</b>
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<b>Name</b>		<b>Organisation</b>			
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<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5G,5I and 5J	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>12.D. a) Do you consider it is necessary to set local parking standards for residential and non-residential development?</b>  <b>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?</b>  <b>Please provide a reason for your response.</b></p> <p>We consider it is important for guidance to be provided by the Local Authority in regards to developments as is it inevitable that residents will have 1 or more cars that will need to be planned for and accommodated on site. However, we consider it is appropriate for applications for residential development to be considered on its own merit and sites in sustainable locations could have reduced parking to allow for encouraged use of public transport and walking and cycling as preferred modes of transport around the settlement.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>		<b>Other</b>	
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Our Ref: NC/PLA780

Your Ref: Issues and Options Consultation 2020

21 April 2020

Forward Planning Team  
Stafford Borough Council

Dear Planning

**Stafford Borough Local Plan: Issues and Options Consultation 2020**

I am writing to submit comments in respect of the current consultation document. These comments are submitted on our own behalf, and also partially on behalf of the Diocese of Lichfield in respect of question 5.G.

Question 5.A

- a) The policy is not required as it essentially duplicates policy in the NPPF. The danger here is that in seeking to replicate the wording of the NPPF, small nuances may creep in and lead to confusion in how policy should be interpreted and applied. Plus, if the NPPF is subject to future revision (which is eminently possible) then the wording of SP1 will rapidly become out of date, leading to confusion over weighting. The NPPF itself advises avoiding unnecessary policy duplication (para 16f).
- b) The policy is not necessary and should be deleted.

Question 5.B

- a) It is necessary for any target to be robust and based on current evidence, but also suitably ambitious and achievable to support the desired rate of growth within the Borough. It is also necessary for any minimum target to take account of the need to provide a suitable level of affordable housing. On that basis, a target in the vicinity of scenarios E and F would appear to be the most suitable to these aims.
- b) It is necessary to approach this with caution, to avoid any possibility of double counting. A sufficiently ambitious and robust minimum target will make a positive contribution towards assisting household formation in younger groups.

## Question 5.D

- i) The expansion of the settlement hierarchy to spread development more evenly across the Borough is welcomed, and the inclusion of smaller settlements is encouraged. However, the cut-off point at the proposed 'small' threshold is not agreed with, and it is argued that there should be an even greater expansion of the hierarchy below to comply with national planning policy.
- ii. It should be noted that the NPPF recognises the contribution that development in small settlements can make to the sustainability of rural shops and services, even where the subject settlement has few or no shops and services of its own. Paragraph 78 states the following:

*"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. Where there are groups of smaller settlements development in one village may support services in a village nearby."*

The consultation document also refers to paragraph Ref ID 50-001-20140306 of the NPPG, which recognises that all settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting development in some settlements and preventing other settlements from expanding should be avoided.

Whilst the expansion is welcomed, the settlement hierarchy doesn't make any allowance for a suitable level of incremental development in settlements below the level of 'small'. In assigning every settlement below 'small' as open countryside, there is a real danger that smaller settlements will be sterilised, and the viability of rural shops and services will be threatened as a result. Such a policy could lead to a vicious circle of unsustainability; in ruling out settlements below 'small' as fundamentally unsustainable, it would effectively artificially freeze those settlements and prevent the type of natural small-scale and incremental growth commonly seen in such small rural settlements through history.

The result of ruling out a swathe of settlements as unsustainable will seriously threaten rural services. This is recognised in the NPPF, which clearly advocates a pragmatic and flexible approach to policy-making in this regard.

An important part of the reason why some small settlements have experienced a decline on shops and services is due to overly restrictive planning policies. The policy needs to enable flexibility and for the exercise of planning judgment on a case by case basis to ascertain whether a development in the swathe of settlements below 'small' will be sustainable.

It is therefore suggested that a further category of 'Rest of Borough' is included, which would cover all settlements at the bottom of the hierarchy. The associated policy should make allowance for small-scale incremental development where there would be no unacceptable harm to amenity and where the development would be judged to be sustainable.

One such example of a settlement below 'small' is Milford. The settlement comprises a substantial number of dwellings centred on the A513 in a roughly linear fashion, and the village sits just outside the wider urban area of Stafford. The village sits on a bus route and has several local shops, facilities and employment of its own, with a wider range accessible by bus or

walking in nearby Walton. The village has a green and is the gateway to Milford Common. The village lies in an AONB and SAC, but these protections do not prevent any development providing it is suitably located and sensitively designed.

A small-scale level of incremental development would be perfectly sustainable and assist in supporting local shops and services. In effectively sterilising such settlements, the danger is that local people, including young families, will find it increasingly difficult to stay living locally and the settlement will effectively become a high-value commuter settlement. This will in turn seriously impact on local shops and services.

The settlement hierarchy and associated policy need to enable planning officers to assert their own professional judgment, rather than advocating an artificial cut-off point below the identified 'small' settlements.

Another important point relates to use of settlement boundaries. Such a tool can be very helpful in determining the broad areas where certain policies apply, and they can be used to prevent unplanned ribbon development.

However, their use should be treated with a high degree of caution. It has been held in various court rulings and appeal decisions (particularly *Julian Wood v SoS and Gravesham Borough Council [2015]*) that such boundaries may not necessarily reflect the position on the ground and should not be used to prevent development that is otherwise sustainable in every other respect. There are numerous examples where councils have used settlement boundary policies to prevent development for no other reason than falling on the wrong side of the line. Whether development should be allowed on the opposite side of a settlement boundary or not should not rest on whether the Council can demonstrate a 5-year housing land supply. The numerous appeal decisions allowing development in those circumstances make that point clear, yet the practice of using settlement boundaries to prevent otherwise acceptable development persists.

Again, it needs to be reiterated that housing targets should be applied as a minimum, and that the drawbridge does not rise on achieving a 5-year supply. If sites come forward outside of the Local Plan process that might be very close or adjoining a settlement boundary, policy should be sufficiently flexible to allow planning officers to use their professional judgment as to whether the development will be sustainable and acceptable or not.

#### Question 5.F

- c) On the whole, the methodology is sound and agreed with. However, we would stress the role that small settlements have in achieving a spread of development across the Borough and in terms of supporting rural shops and services. A strategy that focuses too heavily on a centralised approach should be avoided.

#### Question 5.G

The incorporation of a Garden Community / Urban Extension approach could form part of the overall strategy, but we believe that the best approach would be within growth options 3, 5 and 6. It would not be sound or robust to pursue a strategy that is too heavily weighted on a single growth option or spatial strategy.

If development is to be pursued at Gnosall, our client the Diocese of Lichfield owns various parcels of land around the settlement that could be used to support housing growth. The parcels themselves are unlikely to be suitable for development but could be used for ecology enhancement or amenity / open space. Plans of the two land parcels (namely Land at Brookhouse Way and Land off Forrester's Way – marked as Appendix 1 and Appendix 2) are attached to this letter for information.

Question 5.H

- i. It is considered that the most likely NPPF compliant options are 3, 5 and 6.

Question 5.I

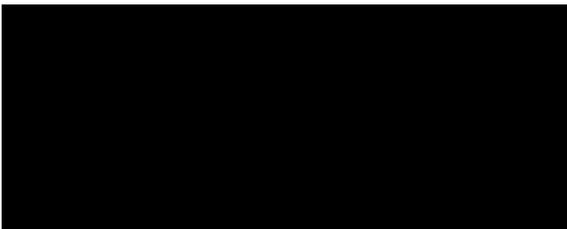
We do consider that there should be provision for a Garden Community, but not at the expense of a strategy that seeks to spread development and enable suitable levels of growth throughout smaller settlements in the rural area.

Question 5.J

A combination of Growth Options for dispersed development across the new and expanded settlement hierarchy (including smaller settlements – see answer to question 5.D), at Garden Community / major urban extensions and within existing transport corridors should be pursued. There should be caution applied to the incorporation of a partial catch-up allowance (see answer to 5.B).

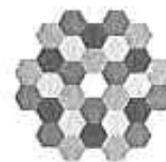
I trust the above is helpful. If you wish anything raised within this document, then please do not hesitate to contact me on the details below.

Yours sincerely



Nial Casselden MRTPI  
**For and on behalf of Fisher German LLP**





# Official copy of register of title

Title number SF536249

Edition date 22.01.2008

- This official copy shows the entries in the register of title on 22 January 2008 at 17:49:44.
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- This title is dealt with by Land Registry Birkenhead (Old Market) Office

## A: Property register

This register describes the land and estate comprised in the title.

STAFFORDSHIRE : STAFFORD

- 1 (22.01.2008) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being land on the north west side of The Cricket Pavilion, Brookhouse Way, Gnosall, Stafford (ST20 0HS).

## B: Proprietorship register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

### Title absolute

- 1 (22.01.2008) PROPRIETOR: LICHFIELD DIOCESAN BOARD OF FINANCE of St Mary's House, The Close, Lichfield, Staffordshire WS13 7LD.
- 2 (22.01.2008) RESTRICTION: No disposition of the registered estate is to be registered unless made in accordance with the Endowments and Glebe Measure 1976 or some other Measure or authority.

## C: Charges register

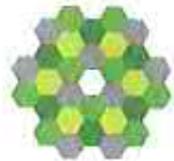
This register contains any charges and other matters that affect the land.

- 1 (22.01.2008) The land is subject to such easements as affect the same by virtue of s.15(1)(b) Endowments and Glebe Measure 1976.

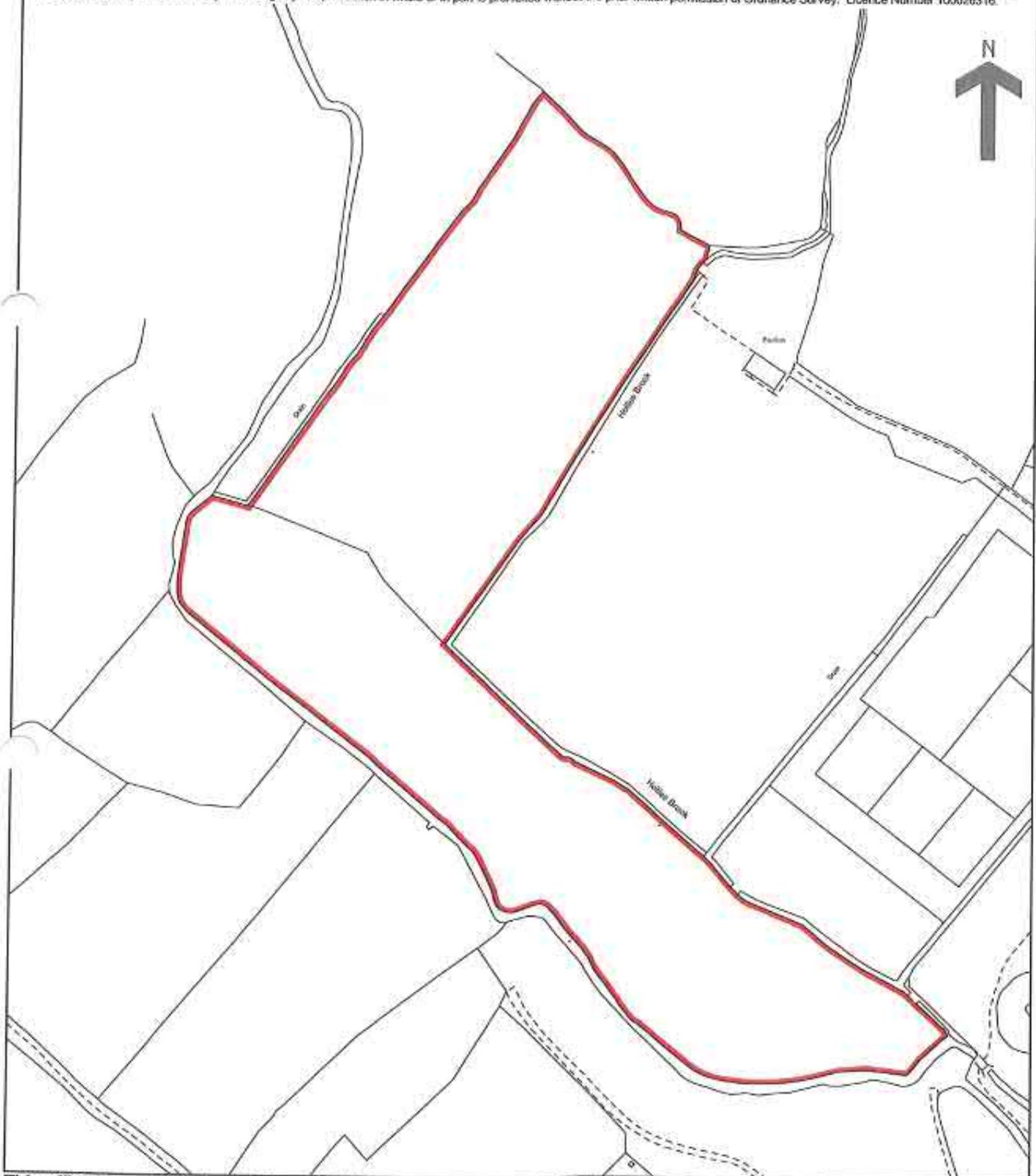
End of register

Land Registry  
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title plan

Title number **SF536249**  
Ordnance Survey map reference **SJ8221SW**  
Scale **1:2500**  
Administrative area **Staffordshire: Stafford**



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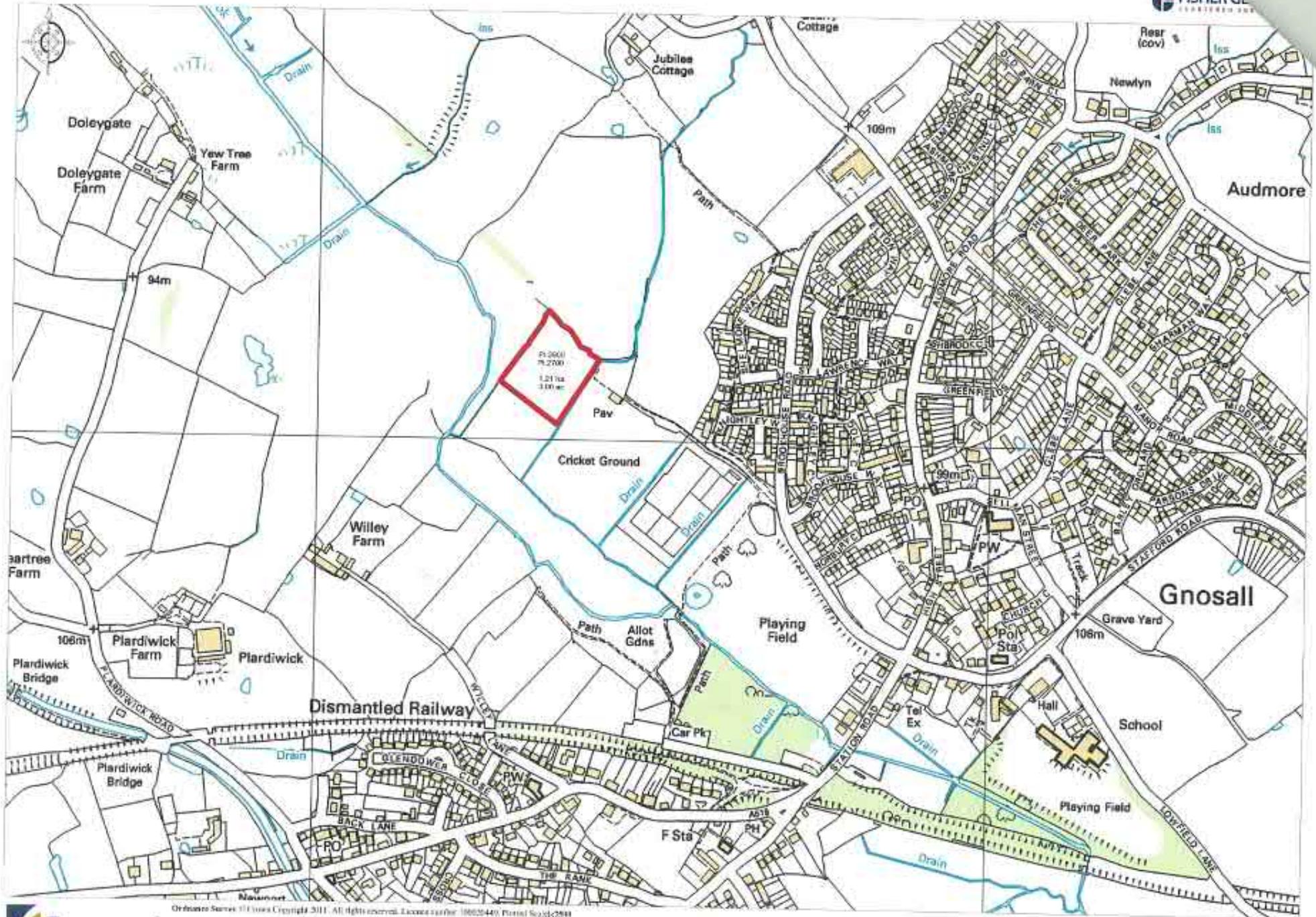


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# Glebe Land at Gnosall, Staffordshire



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



**April 2020**

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## INTRODUCTION

### 1.1 Introduction

- 1.1.1 This representation is submitted by Gladman in response to the current consultation on the Stafford Borough Local Plan Issues and Options Consultation 2020.
- 1.1.2 Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure that residents have access to a decent home and employment opportunities.
- 1.1.3 Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in this representation.
- 1.1.4 The Issues and Options consultation represents the starting point of the plan preparation process and provides an early opportunity to provide comments on key issues and areas for the new Local Plan to address. This consultation is therefore welcomed, and Gladman look forward to engaging further with the Council as the plan preparation process progresses over the next few years.
- 1.1.5 The comments set out through this representation provide Gladman’s early thoughts regarding the key issues the Local Plan will need to address. It is hoped that the comments made in this submission prove useful to the Council in progressing the Local Plan.
- 1.1.6 Gladman submit that the Council will need to carefully consider some of its policy choices and ensure that its evidence base is up-to-date and robust in light of changing circumstances and the changes brought about by the revised National Planning Policy Framework (2019).
- 1.1.7 The revised Framework (2019) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order for it to be sound it is fundamental that the Selby District Local Plan is:
- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; 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;
  - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- **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
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

## **2 NATIONAL PLANNING POLICY**

### **2.1 National Planning Policy Framework**

2.1.1 On 24<sup>th</sup> July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

2.1.2 The revised Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 16 of the Revised Framework (2019) states that Plans should:

- a) Be prepared with the objective of contributing to the achievement of sustainable development;*
- b) Be prepared positively, in a way that is aspirational but deliverable;*
- c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

2.1.3 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that 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<sup>1</sup>.

- 2.1.4 To be considered sound at Examination the emerging Local Plan Review will need to meet all four of the soundness tests set out in paragraph 35 of the revised Framework (2019).

## **2.2 Planning Practice Guidance**

- 2.2.1 The Government published updates to its Planning Practice Guidance (PPG) on 13<sup>th</sup> September 2018. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing Local Plans. Relevant references from the guidance contained in the PPG are made within this submission.

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<sup>1</sup> Revised NPPF – Paragraph 60

## **3 LEGAL REQUIREMENTS**

### **3.1 Duty to Cooperate**

- 3.1.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.<sup>2</sup>
- 3.1.2 The revised Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SOCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The revised Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SOCG), throughout the plan making process<sup>3</sup>. The SOCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 3.1.3 As demonstrated through the outcome of the Coventry, Mid Sussex, Castle Point, St Albans and Sevenoaks examinations, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.

### **3.2 Sustainability Appraisal**

- 3.2.1 In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations).
- 3.2.2 The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the emerging Local Plan proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and

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<sup>2</sup> PPG Reference ID: 61-021-20180913

<sup>3</sup> PPG Reference ID: 61-001-20180913

equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council's decision-making and scoring should be robust, justified and transparent.

## **4 ISSUES AND OPTIONS EVIDENCE GATHERING**

### **4.1 Question 1.A. Is the evidence that is being gathered a suitable and complete list?**

### **Question 1.B. Is the evidence that is being gathered a suitable and complete list?**

- 4.1.1 The plan preparation process should be informed by up-to-date evidence which accounts for local needs and considers the relationship between housing and employment needs and land provision. The documents provided in the New Stafford Borough Local Plan 2020-2040: Evidence Base at the present time offer a current and up-to-date picture of local need. However, it is important to consider the wider strategic implications of preparing a new Local Plan for Stafford and the needs and context of neighbouring authorities should be fully considered as part of the preparation of the plan.
- 4.1.2 To achieve this, it is vital that the plan is evidenced and supported through the auspices of the DtC and Statements of Common Ground. Although Stafford Borough does not fall within a specific Housing Market Area (HMA) it has being previously identified that various HMAs 'overlap' with Stafford and the January 2020 Stafford Borough Economic and Housing Development Needs Assessment (EHDNA) notes that it is recognised that Stafford is part of a broader functional area particularly with the LPAs to the north and also the economic centre of Birmingham to the south.
- 4.1.3 Therefore, it is crucial that the requirements of with all other neighbouring local planning authorities which the Borough has a functional relationship is explored and detailed within the Local Plan evidence base, as set out in paragraphs 35 and 60 of the NPPF.

## **5 SECTION 3 - VISION AND STRATEGIC OBJECTIVES**

### **5.1 Question 3.B. Do you agree that the Vision should be shorter?**

5.1.1 In principle, Gladman agree that the Local Plan's Vision should be shorter providing that it recognises the Borough's need and ambition for growth and how the area will evolve over the plan period 2020 – 2040.

## **6 SECTION 4 - SUSTAINABILITY AND CLIMATE CHANGE**

### **6.1 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?**

6.1.1 The Council will require clear and robust evidence to justify the inclusion of any policy requirement in excess of statutory building regulations and will need to undertake viability testing to ensure that the policies are realistic and deliverable in line with the PPG<sup>4</sup>

## **7 SECTION 5 – THE DEVELOPMENT STRATEGY**

### **7.1 Question 5.A. a) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF?**

7.1.1 Gladman are broadly supportive of the approach taken in the existing Policy SP1 in relation to the presumption in favour of sustainable development within the NPPF. However, it is highlighted that the policy and plan, should contain sufficient flexibility to account for changes in circumstances and local needs over the whole plan period.

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

7.2.1 Gladman support the inclusion of Policy SP1, which sets out the Local Planning Authority's commitment to making local planning decisions based on a presumption in favour of sustainable development. It provides assurance of a local approach to planning that is proactively seeking to improve the social, environmental and economic well-being of the area, confirming that the process of 'weighing up' the relevant factors in decision making will aim to strike an appropriate 'planning balance' across the three pillars of sustainability.

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<sup>4</sup> PPG Reference 002 Reference ID: 10-002-20190509

**7.3 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?**

- 7.3.1 Scenarios B and C would deliver figures which fall below the Local Housing Need figure and therefore in line with guidance set out in the NPPF, Gladman agree with the Council’s approach not to consider these options any further in the plan preparation process.
- 7.3.2 Gladman would be supportive of an annual housing requirement figure of between 647 and 746 dwellings depicted across Scenarios E and F to be planned for in the New Local Plan.
- 7.3.3 Scenario E considers an approach aligned with the aspirations for growth across the Borough, whilst Scenario F is based upon the historic trend in job growth since 2000. Both options are economic-led figures providing a substantial uplift on the Standard Method for calculating local housing need supported by evidence set out in the EHDNA and marries up with the economic growth aspirations across the Borough as identified throughout the Borough and specifically at the Stafford Station Gateway and potential new Garden Settlement.
- 7.3.4 Gladman acknowledge that Stafford Borough is not currently recognised within a strict HMA and Stafford’s most recent needs assessment understands that “...none of the surrounding local authorities at this current point in time will require the Borough to take on board any of their unmet housing need, or vice versa. On this basis, no uplift is required to the LHN to address any identified unmet needs from adjoining districts”<sup>5</sup>.
- 7.3.5 Nonetheless, neighbouring authorities, including South Staffordshire have committed to housing delivery to address the wider unmet housing need in the Greater Birmingham HMA. Given the geography of the Borough and it’s functional relationship with both South Staffordshire and the wider HMA, Gladman emphasise that plan-making authorities should engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan, particularly with neighbouring authorities, such as South Staffordshire District Council, who are also working towards a new Local Plan and to ensure Local Housing Needs are fully accounted for.
- 7.3.6 In addition, Gladman highlight that the Government is expected to review the Standard Method for calculating housing need later this year and this should be accounted for and analysed as part of the ongoing plan preparation process.

**7.4 b) Should a Partial Catch Up rate allowance be incorporated?**

- 7.4.1 The Council have proposed an ‘Partial Catch Up’ (PCU) allowance to “...rebalance the household formation rates to reflect the accelerate rates of young people who are able to form households

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<sup>5</sup>[https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Economic\\_and\\_Housing\\_Development\\_Needs\\_Assessment.PDF](https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Economic_and_Housing_Development_Needs_Assessment.PDF)

since the end of the recession”<sup>6</sup>. Gladman agree that the including such allowance in the Local Plan housing target provides sufficient flexibility to ensure that the Borough’s strategy is responsive to changing housing needs over the entire plan period, however this should be clearly justified through an up to date evidence base.

- 7.4.2 The EHDNA details the reasoning behind the application of a PCU, noting through the analysis in table 10.1 that the propensity for younger people in the Borough to form a head of a household is lower than the national average before relaying the impact upon each housing requirement scenario. However, the EHDNA does not clearly denote the PCU rate which is applied to each housing requirement scenario. Therefore, Gladman suggest that greater clarity in relation to the PCU allowance is set out if it is to be included in the growth strategy for the Borough.

**7.5 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)?**

- 7.5.1 Gladman suggest that further clarity is required in this question and any additional approach. In calculating the Local Housing Needs, using the standardised methodology, it is assumed that any over or under delivery of housing needs is accounted for in the annual affordability ratios<sup>7</sup>. For example, if insufficient homes have been delivered it is anticipated that the affordability ratio would increase, requiring a greater uplift to the base calculation for Local Housing Needs.
- 7.5.2 Providing that the monitoring is up to date for housing completions and commitments these figures can be fed into the delivery of the minimum housing requirement. Notwithstanding this, Gladman advocate inclusion of a greater level of supply than the minimum housing requirement. This would alleviate such concerns and allow full housing needs to be met competitively across the borough.

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<sup>6</sup>[https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Economic\\_and\\_Housing\\_Development\\_Needs\\_Assessment.PDF](https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Economic_and_Housing_Development_Needs_Assessment.PDF)

<sup>7</sup> PPG Paragraph: 011 Reference ID: 2a-011-20190220

**7.6 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?**

7.6.1 Gladman support the inclusion of a settlement hierarchy within the new Local Plan as it ensures that the plan can be interpreted easily, ensures new housing is best placed to provide for a sustainable pattern of development and provides for an effective means to monitor the Plans implementation.

7.6.2 In addition, Gladman agree that Stafford should remain the principle settlement of the Borough as it evidently performs a significantly higher order function than any other settlement and provides suitable locations at which to direct and concentrate future development needs, as set out in the 2018 Settlement Assessment<sup>8</sup>.

7.6.3 Beyond this, Gladman would not object to smaller settlements being included within the settlement hierarchy providing the development implications are clearly denoted. A beneficial approach to addressing rural housing need may be to consider settlements as clusters where they are known to function collectively and growth in one may benefit another, which at present may be considered unsustainable.

**7.7 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?**

7.7.1 Gladman consider that settlements which represent a sustainable location for development should be considered with the settlement hierarchy. However, in line with the NPPF Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified during the plan-making process, examining all other reasonable options for meeting its identified need for development.

7.7.2 Therefore, to ensure clarity within the emerging Plan and that these settlements are delineated within the Borough's growth strategy, Gladman recommend that these areas are identified within a Settlement Hierarchy alongside a clearly set out development and growth implication.

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<sup>8</sup><https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Settlement%20Assessment%20July%202018.pdf>

## **7.8 Question 5.F. c) Which of these spatial scenarios (or a combination) do you consider is the best option?**

- 7.8.1 The SA surmises that to comply with NPPF growth should be dispersed across the settlement hierarchy through existing transport corridors with the potential of a new garden settlement. Therefore, Gladman consider that a mix of the spatial options presented in the Issues and Options document provides for the most sustainable, balanced and deliverable strategy for the Local Plan and will ensure that the Plan is not dependent on any location or site to meet identified housing needs.
- 7.8.2 Gladman consider that the through alignment with the proposed settlement hierarchy, Stafford town should be the focus of housing growth in the Borough with consideration given to the area south of Stafford, located in South Staffordshire District as a sustainable area to locate growth and contribute to the local housing need. Noting that the Local Plan provides the opportunity to support the economic growth aspirations of the Borough, particularly at the main urban towns of Stafford and Stone which benefit from key economic and connectivity opportunities such as the M6 and potential HS2.
- 7.8.3 The result of Stafford's unique geographical location, economic and transport connectivity is that the Borough's housing need cannot be easily directed towards other locations in the authority whilst still benefitting and supporting the economic growth aspirations for the main urban area. Therefore, dispersal of development across small settlements in the district without acknowledging the role of the main urban towns and the housing need required to support economic growth.
- 7.8.4 Beyond Stafford, it is acknowledged that Stone and the 'Large' and 'Medium' Settlements sustainable locations to direct housing development. This should not be ignored by the Local Plan but the growth levels identified should be balanced to avoid unsustainable levels of housing development which could overwhelm existing services or undermine the role of the main town of Stafford.
- 7.8.5 Furthermore, whilst the identification and sustainability of strategic urban extensions (SUE) and new settlements has been considered through the Strategic Development Sites Options document<sup>9</sup>, it is vital that housing delivery through the Local Plan period is also supported through additional sites in a range of locations allocated through the Local Plan in order to promote housing delivery and ensure that the diverse housing needs of the district can be met.

## **7.9 Question 5.G. Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or**

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<sup>9</sup>[https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Strategic\\_Development\\_Site\\_Options\\_0.pdf](https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/New%20Stafford%20Borough%20Local%20Plan%202020-2040/Evidence%20Base%20Documents/Strategic_Development_Site_Options_0.pdf)

**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?**

7.9.1 Gladman acknowledge the role of new settlements and SUEs in delivering housing and employment needs. However, the Council must recognise that the lead-in times and delivery rates of such sites is significant with the resulting contribution to the housing requirements of the emerging Local Plan will be limited.

7.9.2 The Council need to avoid an over reliance on delivery from large-scale sites and caution should be applied to the anticipated delivery timeframes and support housing delivery and diverse needs of the district through allocation additional of small and medium sized sites in a range of locations.

**7.10 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.**

7.10.1 Gladman submit that the above spatial scenarios are NPPF-compliant, however note that the levels of growth directed to each settlement should be evidenced through the settlement hierarchy and the needs of the Borough. It is further reiterated that Stafford town should be the focus of housing growth in the Borough which benefits from key economic and connectivity opportunities such as the M6 and potential HS2.

**7.11 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?**

- 7.11.1 In response to Question 5.I. Gladman highlight the information set out in paragraph 7.11.1 in relation to the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) to determine the spatial strategy and to satisfy the Borough’s future housing and employment needs.

**7.12 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?**

- 7.12.1 As discussed within Section 7 of this representation, Gladman consider that the most appropriate combination of factors for the growth and spatial strategy of the Local Plan should be comprised of a mix of the spatial options which focuses growth towards the town of Stafford whilst being supported through a range of different size housing allocations the implementation of a new garden settlement.

- 7.12.2 Furthermore, to ensure flexibility in the Plan’s ability to respond to changing circumstances and housing needs over the entire plan period Gladman support the inclusion of a PCU rate but remind the Council that this should be supported with further evidence and clarity in its approach.

- 7.12.3 As disputed in response to Question 5.C., Gladman suggest greater clarity in the application of a discount is required. However, it is highlighted that previous housing completions and commitments are accounted for during the standard methodology for calculating the Local Housing Need through the application of the annual affordability ratio. In addition, Gladman would advocate the inclusion of a greater level of supply than the minimum housing requirement which would remove any issues discussed within Question 5.C and ensure local needs are met.

**7.13 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.**

- 7.13.1 Gladman agree that the new Local Plan should not contain settlement boundaries for settlements of fewer than 50 dwellings and should take a flexible approach to growth within and on the edge of villages. The Local Plan should avoid blanket policies which may act to unnecessarily restrain

sustainable growth opportunities on the edge of settlements. This is in contradiction with national policy seeking to boost significantly the supply of housing and applying a presumption in favour of sustainable development.

**7.14 Question 5.Q. Do you agree with the methodology used to define settlement boundaries?**

- 7.14.1 Gladman do not support the use of settlement boundaries if these exclude otherwise sustainable development from coming forward. The Framework is clear that sustainable development should proceed. Use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework.
- 7.14.2 In this regard, Gladman propose that the methodology used to delineate settlement boundaries allows for consideration of sustainable development opportunities beyond the settlement boundary rather than to employ blanket policies restricting otherwise sustainable development.

## **8 SECTION 6 – DELIVERING ECONOMIC PROSPERITY**

### **8.1 Question 6.A. 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?**

- 8.1.1 In line with economic growth aspirations for the Borough and the local housing need figures discussed within Section 5 of the Issues and Options consultation document and the EHDNA, Gladman suggest that the level of employment land should fall between Scenarios 2 and 4. These figures are informed by up-to-date evidence which accounts for current and future local needs and have been considered in relation to the housing need requirements previously discussed in this representation.

## **9 SECTION 8 - DELIVERING HOUSING**

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

9.1.1 Paragraphs 117 and 118 of the Framework is clear that strategic policies planning decisions should make as much possible use of previously developed or brownfield land and give substantial weight to the value of using suitable brownfield land for homes and other needs<sup>10</sup>.

9.1.2 Nonetheless, the Council need to recognise that an approach favouring brownfield land is not a solution on its own to addressing local housing and employments needs, nor may brownfield sites be suitable or available across the settlement hierarchy. The spatial and growth strategy should be supported by suitable greenfield allocations to delivery growth and ensure settlement sustainability.

### **9.2 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: the implementation of a blanket density threshold; or a range of density thresholds reflective of the character of the local areas to be preferable? Why do you think this?**

9.2.1 Gladman are supportive of the efficient use of land as required by the NPPF:

*“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”*

9.2.2 Efficient use of land through increased density would also aid the housing supply through the plan period, particularly in an approach supported by a new garden settlement. However, Gladman note that any minimum level of development density should be appropriately tested through the Local Plan Viability Assessment.

9.2.3 Furthermore, it should be recognised that a blanket density threshold is unlikely to be entirely appropriate and densification should be considered as part of a hybrid strategy where the appropriate density level is applied depending on the size, proposed scheme and particular location of the site.

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<sup>10</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

**9.3 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?**

9.3.1 The inclusion of any policy requirement for the Nationally Described Space Standards (NDSS) will need to be justified through clear and robust evidence and be analysed through viability testing in relation to any specific requirements which they wish to impose.

9.3.2 The Written Ministerial Statement (WMS) dated 25th March 2015<sup>11</sup> confirms that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”*.

9.3.3 In addition, the PPG<sup>12</sup> states, *“where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies”*. Local planning authorities should also take into account viability, need and timing.

**9.4 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?**

9.4.1 Gladman would suggest that a prescriptive housing mix requirement should be avoided, rather that the policy should allow schemes to determine the most appropriate housing mix for the particular location. The type and mix of new housing considered for developments should be prepared with flexibility to ensure that developments are responsive to housing needs evidence across the whole plan period and considers market input to encourage housing delivery and affordability in line with the NPPF.

**9.5 Question 8.H. Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?**

9.5.1 The Framework is clear that LPAs should plan to create safe and accessible environments and take account of evidenced that demonstrates specialist housing needs and plan to meet these needs, stating in footnote 46:

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<sup>11</sup> <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2015-03-25/HCWS488/>

<sup>12</sup> PPG Paragraph: 020 Reference ID: 56-020-20150327

*“planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties.”*

9.5.2 The Council have demonstrated through the EHDNA that there is a requirement to provide dwellings which offer wheelchair accessibility in the Borough. However, if the Council wish to include a policy adopting optional standards M4(2) (accessible and adaptable dwellings) and/or M4(3) (wheelchair user dwellings) it must be ensured that guidance included in the NPPF and PPG is adhered to and evidence relevant and up-to-date.

9.5.3 The PPG<sup>13</sup> sets out the evidence necessary to justify a policy requirement for the above optional standards, stating:

*“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 or care homes).*
- The accessibility and adaptability of existing housing stock.*
- How needs vary across different housing tenures.*
- The overall impact on viability.” (ID: 56-007-20150327)*

9.5.4 Gladman also highlight that a blanket policy approach relation to optional standards and specifically wheelchair accessible properties may not be appropriate across the whole plan area and therefore the requirements may need to vary across locations, sites and schemes.

**9.6 Question 8.1. 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**

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<sup>13</sup> PPG Paragraph Reference: ID: 56-007-20150327)

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

- 9.6.1 Gladman would refer the Council to the response in relation to Question 8.H which discusses optional standards and whether the policy requirements should be included in the new Local Plan.

**9.7 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?**

- 9.7.1 As discussed within the Issues and Options Consultation document the NPPF requires that their size, type and tenure of housing needed for different groups, including where people wish to build their own homes should be assessed and reflected in planning policies.
- 9.7.2 The PPG<sup>14</sup> makes it clear that LPAs must use the self-build and custom home register for their area to ascertain the need for this type of housing and make reasonable assumptions to avoid double counting. Furthermore, authorities should use their evidence on demand in developing their Local Plan documents<sup>15</sup>.
- 9.7.3 The 2019 Annual Monitoring Report from Stafford Borough Council, published in December 2019, states that there have been 45 entries to the Self-Build and Custom Plot register in the Borough. Therefore, it is Gladman's view that enforcing a policy requirement to provide 5% of those plots as serviced for self-build on sites of over 100 dwellings must be justified against the evidenced self-build requirement and assessed in relation to the growth and spatial strategy.

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<sup>14</sup> PPG Paragraph Reference 011 Reference ID: 57-011-20160401

<sup>15</sup> PPG Paragraph Reference 04 Reference ID: 57-014-20170728

## 10 CONCLUSIONS

- 10.1.1 Gladman welcome the opportunity to comment on the Issues and Options document for the Stafford Borough Local Plan 2020-2040. For the Stafford Borough Local Plan to be found sound at examination it must be able to meet the four tests of soundness as required by paragraph 35 of the Framework. These tests are outlined as follows:
- Positively prepared – provide a strategy which, as a minimum seeks to meet the areas objectively assessed needs 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;
  - Justified – an appropriate strategy, taking account the reasonable alternatives based on proportionate evidence;
  - 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
  - Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.
- 10.1.2 It is considered that the themes put forward by the Council to be addressed through the Local Plan form an appropriate basis for plan making, responsive to the material issues and opportunities within Stafford Borough.
- 10.1.3 In line with the economic aspirations set out by the Council, Gladman consider that Council should adopt a positive planning strategy for housing and in this regard Gladman would not support the adoption of land requirements which represent the Standard Method housing need figure. The inclusion of a settlement hierarchy is supported and the housing growth figure should be delivered through a mixed spatial strategy including a potential new settlement with Stafford remaining as the focus for meeting housing and employment need. Beyond this, growth should be considered
- 10.1.4 Gladman would also reiterate that plan-making authorities should engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan, particularly with neighbouring authorities. In this instance, the location in South Staffordshire District to the south of Stafford represents a unique opportunity for engagement between the two authorities to take a strategic plan led approach to delivering sustainably located development unconstrained by Green Belt.

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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>	<b>Mr</b>	
<b>First Name</b>	<b>Mamun</b>	
<b>Surname</b>	<b>Madaser</b>	
<b>E-mail address</b>	[REDACTED]	
<b>Job title (if applicable)</b>	<b>Parliamentary &amp; Research Officer</b>	
<b>Organisation (if applicable)</b>	<b>Habinteg</b>	
<b>Address</b>	[REDACTED]	
<b>Postcode</b>	[REDACTED]	
<b>Telephone Number</b>	[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](mailto: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](http://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.

<b>Part B: Your Comments</b>				
<i>Please complete a new Part B for each representation you wish to make.</i>				
<b>Name</b>		<b>Organisation Habinteg</b>		
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	<b>8.H</b>	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p><b>Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?</b></p> <p>Habinteg has 50 years’ experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response therefore focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Stafford.</p> <p>Habinteg strongly supports a policy requiring 10% of affordable homes delivered to wheelchair accessible standard or Building Regulations M4 Category 3 (<i>wheelchair user dwellings</i> standard). A Habinteg research report (A forecast for accessible homes) published in June 2019 revealed that just 1% of homes outside London are set to be built to the wheelchair dwelling standards between 2019 and 2030, so it is vital that a greater number of new homes are built to wheelchair dwelling standard to meet the needs of wheelchair users across the country.</p> <p>Paragraph 8.23 says “The Planning Practice Guidance states that ‘Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling’. Therefore, to comply with national policy, policies requiring housing to be wheelchair accessible can only be applied to affordable housing.” Habinteg have seen a number of local plans adopted where a policy requires a percentage of both market and affordable homes built to the Part M4(3) standard.</p> <p>There are two types of M4(3) wheelchair user dwellings:</p> <ul style="list-style-type: none"> <li>- M4(3)(2)(a) wheelchair adaptable dwellings (which are dwellings which are ready to be adapted to meet the specific requirements of wheelchair users), and</li> <li>- M4(3)(2)(b) wheelchair accessible dwellings (which are dwellings suitable for wheelchair users at the point of completion)</li> </ul> <p>M4(3)(2)(b) wheelchair accessible dwellings can only be required if the local authority is responsible for allocating or nominating a person to live in that dwelling. A detailed nomination process helps ensure that accessibility features are a good fit for the occupant.</p> <p>If the local authority is not responsible for allocating or nominating a person to live in the dwelling then the wheelchair user dwellings should be specified as M4(3)(2)(a) wheelchair adaptable dwellings. This will mean the dwelling is built with suitable space and layout and have the correct</p>				

infrastructure to easily and cost effectively be fitted to suit the specific requirements of a wheelchair user when needed in the future.

The planning guidance referred to and relevant to this can be found at:

<https://www.gov.uk/guidance/housing-optional-technical-standards>

In light of this, we strongly encourage that the local plan adopts a policy where 10% of all new homes regardless of tenure and market sector are required to meet Building Regulations M4 Category 3 (*wheelchair user dwellings*) standard. Affordable housing should be built to M4(3)(2)(b) and market housing should be built to M4(3)(2)(a).

Habinteg also strongly recommends that the remaining 90% of new homes meet Building Regulations M4 Category 2 (*Accessible and Adaptable* standard). There is no mention within the document to ensure new homes meet the Category 2 standard and we believe this is vital in order to meet the needs of the local population.

Only 7% of English homes have the accessibility features to classify them as 'visitable' it's really important that new homes deliver accessibility and adaptability to help meet the national accessible homes deficit. Habinteg research report (A forecast for accessible homes) revealed that in England only 22% of new homes due to be built by 2030 will meet accessible and adaptable standards. With this in mind we encourage Stafford Borough Council setting out a requirement for 90% of all new homes to meet Building Regs M4(2) standard.

We do not underestimate the benefits of a making a commitment to inclusive design in providing quick and cost-effective adaptations when required. New homes that meet category M4(2) provide a better environment for ongoing independence when needs change, meaning faster hospital discharge and less expenditure on more expensive residential care settings.

The provision of a suitably accessible home in a welcoming and inclusively designed neighbourhood can transform the lives of people who are so often left to 'make do' in unsuitable accommodation. Habinteg tenants have told us that having their need for accessible homes met can have wide-ranging positive impacts, from the ability to access their children's rooms to read a bedtime story, to the ability to cook a family meal, and to come and go as they wish to visit family and friends. We also know that disabled people who have their needs for accessible homes met are four times more likely to be in work than those who don't.

We would like to see Stafford set similar requirements for all new homes as that set down in the London Plan which requires that 90% of new homes are required to be built to part M4 (2) accessible and adaptable standard with the remaining 10% comply with Part M4 (3) Standard. Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of Part M4(3) homes should be considered as a starting point for all local plans.

Further information and sources of expertise:

1. Habinteg's in house consultancy Centre for Accessible Environments, (CAE) offer bespoke training and consultancy on all aspects of access including housing, public spaces and community facilities. CAE's services may be of benefit to the Fareham planning department in ensuring housing is delivered to the required M4(2) / M4(3) standards. The team have delivered support to several local authorities as well as statutory bodies such as Homes England, helping to upskill staff in the specific characteristics of accessible housing, as well as providing practical support reviewing development plans and proposals. You can read more on the CAE website at [www.CAE.org.uk](http://www.CAE.org.uk)

2. Housing and Disabled People, a toolkit for local authorities was a joint project of Habinteg and the Equality and Human Rights Commission published in 2018. The chapter on Planning for Accessible Homes provides some useful suggestions for the production of robust planning policy for accessible housing. <https://www.habinteg.org.uk/ehrc>

Please don't hesitate to get in touch with us if we can help in any way. [REDACTED]

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>		<b>Other</b>	

**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-](http://www.staffordbc.gov.uk/new-local-plan-)

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

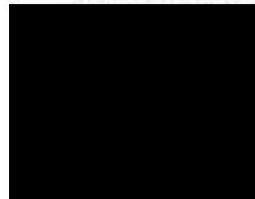
Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your name and organisation will be made available. We will only use your personal information to send you information on the New Local 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](http://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](mailto:forwardplanningconsultations@staffordbc.gov.uk)

Our Ref: P1390/SS  
Date: 20 April 2020

Grosvenor House



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

**Emailed to:** [forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)

Dear Sir/Madam

**Stafford Borough Local Plan 2020 – 2040  
Issues and Options Consultation  
Response by Dwell Developments Limited**

Harris Lamb Planning Consultancy has been instructed by Dwell Developments Limited to submit representations to the Stafford Borough Local Plan 2020 – 2040 Issues and Options Consultation. Dwell Developments has land interests to the south of Stafford, on the site known as land to the west of Moss Pit and welcome the opportunity to comment at this time. Their site is located to the north of existing houses and employment sites and is just under a hectare in size. It could be delivered independently or as part of a larger allocation to the south of Stafford.

**Question 3.A**

**Do you agree that the Vision should change?**

Yes, we agree that the Vision should change. Since the Local Plan was adopted in 2014, the National Planning Policy Framework (**the Framework**) has fully bedded in and sets out the achievement of sustainable development as the key planning objective. The Vision for Stafford should reflect this and should be amended accordingly.

**Question 3.B**

**Do you agree that the Vision should be shorter?**

Yes, it should be shorter. A more focussed, succinct version should be able to satisfactorily set out what the Council are aiming to achieve.



#### 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?

Building regulations are routinely amended to achieve higher environmental standards and to respond to the challenge of Climate Change. This is inline with the Ministerial Statement from 2015, which explains that Building Regulations will be the Government's tool to achieving the energy efficiency levels needed. Consequently, Dwell Developments do not agree that the inclusion of planning policies requirements to achieve higher environmental standards than the current system of building regulations is appropriate at this time.

#### 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?**

Dwell Developments do not object in principle to the idea of large developments sourcing a proportion of their energy supply from on-site renewables, however, it is not always possible to do so and as such, a blanket requirement may not be achievable. If the Council do proceed with such a policy, that the requirement should be subject to where this is technically possible and where it would be financially viable to do so.

#### Question 4.E

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

No. Duplication of control again and should be avoided.



### 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.**

- a) Yes, as it replicates what is in the Framework
- b) No, we do not consider it is necessary as the Framework is a material consideration when considering planning applications and so its duplication is unnecessary.

### 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?**

In applying the standard method, the housing requirement would be 408 dpa, which is lower than the adopted Local Plan housing requirement of 500 dpa. The spatial portrait of the Borough that is set out in Chapter 2 of the consultation document notes that:

- The proportion of 40 – 60 year olds in the Borough is projected to decline
- There is going to be a significant increase in over 60 year olds
- The majority of housing is owner occupied and is largely detached properties
- Affordability is worsening

The four points set out above all indicate that the Council should not be looking at planning for a housing requirement lower than the adopted Local Plan, because this would compound issues in relation to attracting working age people to the Borough whilst also making it more expensive for people to purchase a house. As such, the housing requirement going forward should be at least 500 dpa as per the adopted plan. Dwelling Developments contend that there is also a clear case for proposing a much bolder housing requirement than the adopted figure. In this context Scenario E, F or G should be pursued, because these options come with significant economic and social benefits.

Dwell Developments agree that a Partial Catch Up rate should be applied as the headship rates contained in the Sub National Household Projections do not fully take account of household

formation amongst 15-34 year olds which was suppressed during the last recession. The application of a PCU would ensure that the full needs of the Borough are planned to be met.

Once the housing requirement has been set, the plan will need to make provision for how this is going to be delivered in practice. This will not only include sites that can clearly demonstrate their delivery within the plan period, but also through the identification of sufficient sites to form a buffer over and above the housing requirement. A 20% buffer would assist in securing the delivery of the Borough's housing, because it acknowledges that not all sites will deliver as planned.

### **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.**

Dwell Developments do not consider that a discount should be applied. The Council is preparing a new Plan with a base date of 2020. The housing requirement is set from this date and sites should be identified within the new plan to deliver the identified need. The new base date will reset the Plan and the housing requirement. There would be no double counting. An approach that seeks to discount against the future housing requirement in a previous plan is not one that is supported by either the Framework or PPG and we do not consider that such an approach would be considered Sound.

Dwell Developments are also concerned about the intention to roll forward 3,000 uncommitted dwellings on Strategic Development Locations. This is a significant number of potential dwellings and reassessing their deliverability before rolling them forward is essential. These sites should be subject to detailed scrutiny to understand why these sites have not come forward to date. It is not uncommon for situations to change on sites or for fundamental issues to be found on a more detailed review of a site which undermine its deliverability. Where this is found to be the case it would not be justified to roll forward. Where sites are proposed to be rolled forward then clear justification should be provided to support their continued deliverability.



#### **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?**

Dwell Development agree with the basis for the preparation of the 2019 Settlement Hierarchy and welcome the continued inclusion of Stafford at the top of the hierarchy and the key driver for growth.

Dwell Developments acknowledge that some of the smaller settlements need some new development to help sustain them going forward; however, a more dispersed strategy is inherently less sustainable. Larger settlements are more sustainable and large allocations provide the opportunity to deliver key services and facilities needed to support the new residents. Consequently, the identification of sites in smaller settlements should not be at the expense of more sustainable development at larger 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**

Dwell Developments consider that all reasonable options have been proposed.

In terms of which to avoid, we do not consider that either intensifying development in town centres or dispersing it across the Borough would deliver sufficient levels of development to meet identified needs. Similarly, a new settlement would have a significant lead in time for it to start delivering new housing and dependent on how long it takes, reliance on a new settlement to meet the Borough's housing needs could result in a five year land supply shortfall. If new settlements are considered, we need to be realistic about what they can deliver in the plan period and the evidence is clear that new settlements are unlikely to make a meaningful contribution to supply unit the next plan period.

In terms of what combination of scenarios we would recommend, it is key to the delivery of new housing is directing it to the most sustainable locations. In our view, this is around the edge of existing settlements where there are already a good range of shops, services and facilities present



and where there are existing public transport routes. As such, intensification around existing settlements should be the focus for new development.

Within this a range of sites, of a range of sizes, should be included in order to spread the burden of delivering the houses on a wider range of developers. Similarly, when looking at large allocations, flexibility should be considered to see if parts of sites could be released quickly to help with delivery in the short term, whilst not undermine the comprehensive development of the allocation.

### **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 have set out in our response to Question 5.F above support the role of larger urban extensions as part of a balanced mix of allocations. It is important to be realistic about what can be delivered on one site within the plan period, however, the provisions of such sites is clearly supported by the Framework and provide the critical mass to secure the infrastructure improvements and the provision of the necessary supporting services and facilities.

Only Stafford present the size of settlement to accommodate such an urban extension / community and the Council will need to consider the options available at Stafford after the various constraints (e.g. Flood Zones, M6, etc) are considered.

### **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.**

Dwell Developments are of the view that even if the Council do pursue the option of a new settlement, this will not necessarily start delivering units for many years. We do not wish to discourage this as an option, but realistically planning for this now is more likely to support delivery at the back end of the existing plan period and into the next plan period. Such a proposal will certainly not deliver in the first half of the plan period and so a strategy that includes a new settlement will still need to include a sufficient level of deliverable sites in order to maintain 5 years'



worth of deliverable sites and 10 years' worth of developable sites. In our view, a new settlement is only likely to help ease development pressure on existing settlements in the longer term.

#### **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? Please explain your answer.**

In light of the responses set out above, we can summarise the suggested combination of factors that Dwell Developments would be seeking for the Council to put forward in the Preferred Option. These are:

- 1) Growth Scenario E, F or G
- 2) Apply a Partial Catch Up
- 3) Do not apply a discount
- 4) Urban extension to Stafford

The reasoning behind this is set out in the consultation above and is focused around promoting a positive approach to growth to help boost the supply of housing, boosting economic growth and provided affordable housing.

#### **Question 8.A**

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

Clearly the reuse of brownfield land over greenfield land is preferable but this is only possible where there is sufficient brownfield land available. The deliverability of these site will also need to be carefully considered to make sure they have a realistic chance of being delivered.

Where there are not vast reserves of deliverable brownfield land then there is little option other than to look at opportunities to develop greenfield land. In Stafford Borough it is evident that greenfield land will still be needed to meet the development needs of the Borough.



### 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 Framework sets out at Chapter 11 that new development should make efficient use of land. As such, there is an underlying requirement that when undertaking development, one should seek to make the most efficient use of land. As such, Dwell Developments would support the enforcement of minimum density thresholds as a target to achieve when undertaking new development. However, every site is different and whilst one can aim to achieve a set density the reality is that this is not always possible for a variety of reasons. This can be due to physical, environmental, design and/or heritage factors, and any such policy should be caveated to allow for an appropriate design response.

### 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?**

Dwell Developments do not disagree that the Nationally Described Space Standards (NDSS) can have a positive impact on housing standards. However, there are a number of factors that need to be considered when deciding to pursue such a policy, including:

- The need for an internal space standard will need to be justified in accordance with Footnote 46 in the Framework;
- The impact this will have on the viability of schemes and the ability to deliver other planning obligations, including affordable housing; and
- The impact on the affordability of homes (i.e. does making homes large just make them more expensive to buy).

Furthermore, making houses larger does not necessarily make them better to live in. Design has a much greater impact. Similarly, even whilst the resident of that larger house might benefit, this is not going to be better for the resident who misses out on an affordable dwelling because a



reduction in the number of affordable units was agreed to make the scheme viable or for the resident who can no longer afford the larger dwelling and cannot access the housing market without relocating.

Stafford is not a location known for substandard housing and affordable dwellings already benefit from size standards set out by Homes England. We cannot, therefore, see that there is a need for internal space standards to be applied in the Borough.

**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?**

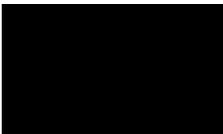
**Please explain your answer.**

In light of the response to Question 8.D we contend that NDSS should only apply to new build dwellings where there is a proven need to do so.

If a policy is pursued, then as a minimum this should allow for the provision of NDSS to be subject to the impact on viability.

We trust you take our comments into consideration as continue preparation of the Local Plan and we look forward to being notified of further stages of consultation on the Plan going forward. Should you require any clarification or have any questions about the comments above please do not hesitate to contact me.

Yours sincerely



**Sam Silcocks BSc (Hons) MA MRTPI  
Director**



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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>		Mr
<b>First Name</b>		Michael
<b>Surname</b>		Eld
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		Estate Manager
<b>Organisation (if applicable)</b>		Harrowby Estates
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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](mailto: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](http://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.

<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name: Michael Eld</b>		<b>Organisation: Harrowby Estates</b>			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	1A	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>We do not agree that the list is complete. Additional studies should be shown to include:-</p> <ol style="list-style-type: none"> <li>1) The potential for expanding the local provision of aggregate for construction purposes as it is imperative that on development proposals of this scale that local resources are used to minimise the environmental impact.</li> <li>2) Current data on Electricity networks and proposals to increase capacity using renewable resources.</li> <li>3) Transport network assessment.</li> </ol>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	1B	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<ol style="list-style-type: none"> <li>1) We feel that there is a potential conflict of interest with regard to some of the proposed sites and would therefore recommend that maps and plans showing the County Council’s agricultural holdings in relation to the proposed plan shown on page 55 (section 5.35) of the Issues and Options Consultation Document.</li> </ol>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	3A	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	3B	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	3C	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes and furthermore we are of the view that apart from some specific exclusions (unheated space or space that does not have the capacity to be heated), development should only be permitted where renewable energy provision is included (PV, Solar Thermal, Geothermal/Ground source heating, Air source heating or other technologies that may be available).					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	3D	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) We comment solely on items 21 to 28 (areas outside Stafford and Stone). b) Yes c) Immaterial.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	3E	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) We comment solely on items 21 to 28 (areas outside Stafford and Stone). b) Yes					

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>3F</b>	<b>Other</b>	

**2. Please set out your comments below**

We comment solely on items 21 to 28 (areas outside Stafford and Stone).

Yes. Improvement of electrical infrastructure must be included and provided for by CIL contributions from the wider Borough as without it there are no significant renewable energy schemes that can be put in place for large swathes of the Borough.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>4A</b>	<b>Other</b>	

**2. Please set out your comments below**

- a) Yes, wherever possible. It is our view that the statutory building regulations are inadequate and that all newly constructed properties in the Borough should be as efficient as technologically available at the time of construction.
- b) We would want to see mandatory installation of renewable energy systems in all development (PV, Solar Thermal, Geothermal/Ground source heating, Air source heating, or other technologies that may be available). and a requirement for local sourcing of aggregate wherever possible. This latter step will require adjustments to the minerals plan.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>4B</b>	<b>Other</b>	

**2. Please set out your comments below**

For larger scale generation we are of the view that the Borough should actively promote the establishment of Solar Farms, and Biogas installations. Installation should take place on poorer quality land, brownfield sites or adjacent to high energy use locations (e.g. industrial estates). It should be noted, however that grid connectivity in the areas surrounding Stafford are very poor which has hamstrung the development of renewable generation. S106 funding / CIL funding should be diverted to cover the costs of network upgrades.

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>4C</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
In principle yes – however operating a percentage-based system on estimated power consumptions will be difficult to police / enforce and we would suggest that a target is set per square metre of space that can be heated.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>4D</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>4E</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
We do not agree that this standard should be higher than the building regulations – however we would support the mandatory inclusion of greywater / stormwater use for non-potable purposes in all new developments to both reduce the water consumption but also assist with the flood risks (increasing water retention and storage) or water supply in drought conditions.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5A</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) Yes b) No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5B</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5C</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5D</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
i. Yes ii. Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5E</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No due to their proximity to Stoke on Trent we would advocate that development in these areas is kept to a minimum to reduce the risk of urban sprawl in the medium term.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5F</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) Yes</p> <p>b) We would avoid the use of Garden Communities.</p> <p>c) We would want to see a combination of:-</p> <p style="margin-left: 20px;">a. Intensification of Town and District Centres</p> <p style="margin-left: 20px;">b. Dispersal of development</p> <p style="margin-left: 20px;">c. String settlement</p> <p style="margin-left: 20px;">d. Wheel settlement.</p> <p>The reasoning behind our response to 5FC is that a. will help revitalise town centres with additional population. b. would help address the imbalance that currently exists in the Borough from the last Local Plan and would assist rural communities to become sustainable. C. &amp; d. would enable the better development of public transport and other relationships between communities (including school and leisure facilities).</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5G</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>We do not agree that the Garden Community / Major Urban Extension would be helpful in satisfying the Borough’s future housing and employment land requirements. Moreover, we are aware that the Local Authority has not approached at least some of the major Landowners in the options that have been brought forward and these options are in fact not deliverable.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5H</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>i) Yes</p> <p>ii) N/A</p> <p>iii) No comment.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5I</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>No. We are of the view that Garden Communities will disproportionately effect investment into existing communities to their detriment and will sustain significant ecological damage to the rural environment unnecessarily. We also note that no declaration of interest has been provided by the Local Authority with regard to Agricultural Holdings owned by the County Council and their relations to the proposed Garden Village sites.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5J</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Item 4 (no Garden Community) should be put forward at the next stage. Please note our comments to 5i for the reasoning.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5K</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>No comment.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5L</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>No comment.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5M</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5N</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No. In the scenario where no Garden Community occurs, the weighting of employment land is too heavily in favour of Stafford. Instead we would support the significant expansion of existing industrial estates / commercial areas with good transportation links outside the urban environment as we are of the view that these could most easily adopt higher environmental standards in their construction and delivery.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5O</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5P</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5Q</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>We are of the view that settlement boundaries can only be decided on a case by case basis. Based on past experience of planning in the Borough we have found that these boundaries have been created in an unrealistic manner and used to stymy all but in-fill development in the rural communities. We are concerned that should this happen again, the development targets set will be unable to be fulfilled.</p> <p>We are concerned by the comments relating to Rural exception sites under 5.96 and the aim being to ensure that they are not converted into Market Housing. We feel that this statement would indicate that the Local Authority is seeking to remove Rural exception sites from Planning Policy against National guidance and would ask that this is clarified. Additionally we are of the view that it is reasonable for the land up to the exception sites on the edge of settlements to be included bearing in mind that we do not support the use of Garden Developments and there will need to be a greater allocation to the existing communities.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6A</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6B</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) Yes</p> <p>b) Yes</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6C</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
We would support the expansion of existing employment areas (industrial estates) to incorporate all types of employment development.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6D</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6E</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes, but only in Extra Urban settings.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6F</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<ul style="list-style-type: none"> <li>a) Mixed in with sites with larger units to support sustainable infrastructure.</li> <li>b) Building type and size should not be restricted but rather guided by market requirements and also local setting / locational issues IE large distribution units should be situated close to motorway junctions and smaller units disbursed throughout the Borough.</li> </ul>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6G</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) No. It has been adequately demonstrated in the Covid-19 crisis that many office functions can be performed at home.</p> <p>b) Not applicable should home working for office functions continue to rise. Provision would be better made for improving internet connectivity across the Borough and we would suggest that CIL could be re-purposed to improve connectivity and reduce the requirement for purpose build office developments.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6H</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) Yes</p> <p>b) Increase size of Settlement boundaries and include employment provision requirements. Expand existing rural business parks / industrial sites. Consider a policy to allow the creation of new rural business parks – in particular on redundant farm yard sites with modern buildings.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6I</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) Yes.</p> <p>b) Yes and to be paid for by use of CIL if Central Government Funding not available.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6J</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6K</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Not that we are aware.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>6L</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) Further support should be given for the development of Marinas and Canal Facilities with a presumption in favour of development with the provision of an economic case. b) No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>7A</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) No comment. b) No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>7B</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) Yes b) No comment. c) No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	7C	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	8A	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	8B	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No, but if the Council must take this course of action then we would prefer to see density thresholds that reflect the local character AND an exemption for the provision of bungalows in rural areas.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	8C	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No due to the evolving conditions of home working, home deliveries and electric vehicles.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8D</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8E</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) No  b) Yes  c) No</p> <p>Please note that the current plan does not allow for the extension of barns for conversion during the planning process and we are of the view that this position is iniquitous and obstructs the provision of higher quality, sustainable development in rural areas and we would recommend that this position is changed.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8F</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8G</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Yes. There is a lack of provision of smaller single storey (i.e. bungalows) in rural areas which are required by people who wish to stay within their existing communities but downsize. A presumption in favour of development of these sorts of houses for both the sale and rental sectors in rural areas should be implemented.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8H</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes, so long as the size of a “major development” is kept reasonable. In our view this would be in developments of over 20 houses.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8I</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) Yes. We would suggest 5% of developments of over 20 houses. b) No. c) Yes. d) No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8J</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
We agree with the statement.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8K</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) No comment. b) No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8L</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>We are of the alternative view that the Local Authority should develop a policy allowing the construction and development of Rural affordable units through a mechanism of “Enabling Development” by which high value sale plots are made available to fund the construction and provision of Rural Affordable Housing to be made available to the rental sector in rural communities by private Landowners.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8M</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>No comment.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8N</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) No b) Yes</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8O</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) Yes, so long as planning permission can be gained by Landowners for open market sale to prospective self builders. Without these measures there will be insufficient supply of sites to make the policy effective. Pre-start conditions could assist implementation of these rules and charges against title could be taken to ensure compliance for a defined period post construction.</p> <p>b) No, as rural communities often struggle to afford investment in their own areas. Local housing provision should be dealt with by way of rural affordable housing. As previously stated, we are of the view that rural affordable units should be provided through a mechanism of “Enabling Development” by which high value sale plots are made available to fund the construction and provision of Rural Affordable Housing to be made available to the rental sector in rural communities by private Landowners.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9A</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9B</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>The plan should work in conjunction with rural landowners to identify areas in the Borough where environmental projects can be introduced and fund these projects through CIL or other mechanisms. It is important that funding covers both initial creation and ongoing maintenance.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9C</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) Yes</p> <p>b) Encourage the biodiversity of sites through development – for example allocating sites which can deliver biodiversity enhancement.</p> <p>We are of the view that all sites should have an element of biodiversity enhancement but note that this should not necessarily be confined to the development site but can also be achieved through development funding the installation and ongoing maintenance of third party sites. In particular we recommend that the funding of the installation and maintenance of woodland and wetland habitats would far increase the biodiversity / natural capital credentials of development.</p> <p>c) Require increased long term monitoring of biodiversity mitigation and enhancement features on development sites.</p> <p>Though the principle is laudable we are doubtful that the planning / enforcement teams could undertake this work effectively and therefore would suggest that this process be confined to industrial / commercial sites only. Additionally, we note that if the biodiversity assets are on large third party sites then the monitoring will be much simpler to administer if required.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9D</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9E</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes, though we would want to see a greater weight placed on the finding and creation of new woodlands through CIL funding / S106 funding.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9F</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No. We do not consider this proposal viable and would instead recommend the use of CIL to invest in the connectivity (transport, communications and upgrading electrical networks) of rural communities.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9G</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9H</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9I</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
1.) No 2.) No 3.) Yes 4.) Yes 5.) Yes – we are of the view that this is essential.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9J</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9K</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9L</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) Yes, so long as “large-scale” is set above 20 houses. b) Yes c) Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9M</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9N</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9O</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) Yes b) Yes					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>10A</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) Yes</p> <p>b) Though we applaud the concept, we are of the view that the policy would hinder development in rural areas and would want to see exceptions in place to facilitate the rural economy. We also note that the increased use of video conferencing, working from home (as experienced in the Covid-19 outbreak), electric vehicles and provision of suitable infrastructure at major developments negates some of the arguments for the universal provision of public transport to major developments.</p> <p>a) Enforce Air Quality Management Zones around areas of notable biodiversity importance?</p> <p>Yes</p> <p>b) Employ any further methods which you consider will aid in the improvement of air quality in the Borough.</p> <p>Yes in principle – however this is outside our area of expertise.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>10B</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Yes</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>10C</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) We do not consider that this is a practical suggestion and would suggest that greater support for recycling centres and use of composting for biogas energy generation would be more sustainable in the long run as well as not negatively impacting on sustainable development.</p> <p>b) We feel that this suggestion has some merit however this should only be applied to medium (in excess of twelve houses) sized developments so not to negatively impact the economic viability of small rural development sites</p> <p>c) Yes</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	11A	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) Yes</p> <p>b) No</p> <p>c) It should be a core principle.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	11B	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	12A	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Yes, however we have electrical infrastructure concerns for the provision of personal motorised transport in rural areas in the future which could usefully be addressed in the Plan.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	12B	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>a) Yes</p> <p>b) For urban areas only they should be covered onsite through planning conditions. In the event that no onsite facilities are practical then CIL / S106 funding should be used to fund walking and cycling facilities in the local area.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	12C	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) No comment b) Yes to reduce pressure on “fly parking” especially in rural areas.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	12D	<b>Other</b>	
<b>2. Please set out your comments below</b>					
a) No comment. b) No comment.					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	12E	<b>Other</b>	
<b>2. Please set out your comments below</b>					
No comment.					

*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-](http://www.staffordbc.gov.uk/new-local-plan-)

Please e-mail your comments (Preferred) to: [forwardplanning@staffordbc.gov.uk](mailto: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](http://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](mailto:forwardplanningconsultations@staffordbc.gov.uk)

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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>		<b>Ms</b>
<b>First Name</b>		<b>Sue</b>
<b>Surname</b>		<b>Green</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Planning Manager</b>
<b>Organisation (if applicable)</b>		<b>Home Builders Federation (HBF)</b>
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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](mailto: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](http://www.staffordbc.gov.uk/new-local-plan)- or call 07800 619636 / 07800 619650.

**Please note:**

- Comments must be received by 12noon on Tuesday 21 April 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.

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

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>		<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please see attached letter.					

***Please use a continuation sheet if necessary***

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

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

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

SENT BY E-MAIL ONLY TO  
[forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)

21 April 2020

Dear Sir / Madam

## **STAFFORD NEW LOCAL PLAN – ISSUES & OPTIONS CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above-mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following responses to specific questions in the Stafford New Local Plan Issues & Options consultation.

### **Section 1 – Introduction**

#### **Question 1.A. Is the evidence that is being gathered a suitable and complete list?**

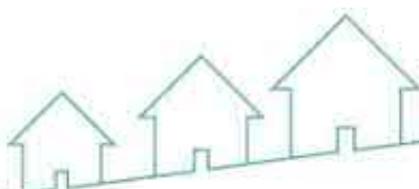
The evidence listed is not complete (see HBF answer to Question 1.B. below).

#### **Question 1.B. Have any key pieces of evidence necessary for Stafford Borough's new Local Plan been omitted?**

As set out in the 2019 National Planning Policy Framework (NPPF), all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31).

The HBF note that the Council is considering some policy options, which if pursued would require the gathering of specific supporting evidence to justify such policies. These policy options are identified as :-

- Questions 4.A. & 4.C. - Higher energy efficiency standards ;
- Question 4.E. - Optional water efficiency standards (see National Planning Practice Guidance (NPPG) ID : 56-013-20150327 to 56-017-20150327) ;
- Questions 8.B. & 8.C. – Residential densities ;



- Questions 8.D. & 8.E. – Nationally Described Space Standards (NDSS) (see NPPG ID : 56-020-20150327) ;
- Questions 8.F. & 8.I. - Housing mix ;
- Question 8.H. – Optional accessible & adaptable homes standards (see NPPG ID : 56-005-20150327 to 56-011-20150327) ; and
- Question 8.N. - Self & Custom Build housing (see NPPG ID : 57-011-20160401, ID : 57-025-201760728 & ID 2a-017-20192020).

## **Section 4 - Sustainability and Climate Change**

### **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?**

The new Local Plan should not require all developments to be built to a standard in excess of statutory Building Regulations.

Today's new homes are very energy efficient with lower heating bills for residents compared to existing older homes. The HBF support moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements, which is universally understood and technically implementable. The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations but consider that the Council should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations. It is the HBF's opinion that the Council should not be setting different targets or policies outside of Building Regulations. The key to success is standardisation and avoidance of every Council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for both product manufacturers, suppliers and developers.

Recently, the Government held a consultation on The Future Homes Standard (ended on 7<sup>th</sup> February 2020). The UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. It is the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. The Government's consultation addressed :-

- options to uplift standards for Part L (Conservation of Fuel & Power) and changes to Part F (Ventilation) Building Regulations. An increase in energy efficiency requirements for new homes in 2020 will be a meaningful and achievable stepping-stone to The Future Homes Standard in 2025. This is expected to be achieved through very high fabric standards and a low carbon heating system based on one of two Options. Both Options increase costs for housebuilders (estimated costs between circa £2,557 - £4,847 per dwelling). The Government's preferred Option 2 proposes 31% reduction in carbon emissions

- compared to current standards (Approved Document L 2013) delivered by installation of carbon saving technology and better fabric standards ;
- transitional arrangements to encourage quicker implementation ; and
  - clarifying the role of Local Planning Authorities (LPA) in setting energy efficiency standards. The Government is proposing to remove the ability of LPAs to set higher energy efficiency standards than those in Building Regulations, which has led to disparate standards across the country and inefficiencies in supply chains. The Government wants to create certainty and consistency. The situation is confusing with decisions about technical appropriateness, application and enforcement of energy standards considered by planning officers, committees and Planning Inspectors rather than by qualified Building Inspectors. An uplift to Part L standards in 2020 will improve the energy efficiency of new homes and prepare housebuilders and supply chains in readiness for the further uplift in 2025 to meet The Future Homes Standard so there is no need for LPAs to seek higher standards.

The HBF's response to the Government's consultation recognises and supports the need to move to The Future Homes Standard but the Government's preferred Option 2 for a 31% reduction in carbon emissions compared to the current Part L 2013 requirements in 2020 would be difficult and risky to deliver given the immaturity of the supply chain for the production / installation of heat pumps, and the additional load that would be placed on local electricity networks when coupled with Government proposals for the installation of electric vehicle charging points (EVCP) in new homes (also see HBF answer to Question 12.D.a)). The HBF and its Members favour the Government's Option 1 for a 20% reduction in emissions in 2020 (involving higher fabric efficiency standards than Option 2) and then a further step to Option 2 standards by 2023, which would allow more time for the supply chain to gear up for the scale of demand entailed. The HBF submission argues that *"a stepped and incremental approach should be adopted given, in particular, the large requirement for supply chain and infrastructure investment and skills training to support this ambition. The consensus is that Option 1 should be implemented within 2020, with Option 2 being implemented within two to three years in approximately 2023. Our membership sees that transitional arrangements around this implementation should be 18 – 24 months"*.

**Question 4.A.b) What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?**

The new Local Plan should not introduce further policies (see HBF answer to Question 4.A.a) above).

**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?**

The new Local Plan should not introduce such a policy (see HBF answer to Question 4.A.a) above).

**Question 4.E. Should the council implement a higher water standard than is specified in the statutory Building Regulations?**

Under current Building Regulations, all new dwellings must achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the NPPG (ID 56-013-20150327 to 56-017-20150327). The NPPG references *“helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand”* however the Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas.

**Section 5 - The Development Strategy**

**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.**

Existing Policy SP1 is not necessary. It should not be retained. The presumption in favour of sustainable development is clearly set out in the 2019 NPPF (para 11). The 2019 NPPF confirms that Local Plans should avoid unnecessary duplication including repetition of policies in the NPPF itself (para 16f). As set out in the NPPG (ID 61-036-20190723), there is no need to directly replicate the wording of the 2019 NPPF (para 11) in a policy in a Local Plan. By attempting to repeat national policy, there is a danger that some inconsistencies creep in and lead to small but critical differences between national and local policy causing difficulties in interpretation and relative weighting.

**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 Economic & Housing Development Needs Assessment (EHDNA) dated January 2019 by Nathaniel Lichfield & Partners sets out Stafford’s future housing growth requirements.

Under the 2019 NPPF, the Council should establish a housing requirement figure for their whole area (para 65). The 2019 NPPF also sets out that the determination of the minimum number of homes needed should be informed by a Local Housing Needs (LHN) assessment using the Government’s standard methodology unless exceptional circumstances justify an alternative approach

(para 60). The standard methodology is set out in the latest NPPG (ID : 2a-001-20190220 to ID : 2a-015-20190220).

Stafford's minimum LHN is calculated as 408 dwellings per annum based on 2014 Sub National Household Projections (SNHP), 2019 as the current year, 2018 affordability ratio of 7.38 and no cap. This calculation is mathematically correct.

As set out in the NPPG, the LHN is calculated at the start of the plan-making process however this number should be kept under review until the new Local Plan is submitted for examination and revised when appropriate (ID 2a-008-20190220). The minimum LHN for Stafford may change as inputs are variable and this should be taken into consideration by the Council. The Government has also confirmed its intention to review the standard methodology over the next 18 months. If the Government applies a different approach following this proposed review, it may be necessary for the Council to update its LHN assessment.

The Government's standard methodology identifies the minimum annual LHN. It does not produce a housing requirement figure (ID : 2a-002-20190220). LHN assessment is only the minimum starting point. The Government's objective of significantly boosting the supply of homes as set out in the 2019 NPPF remains (para 59). Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere may necessitate a housing requirement figure above the minimum LHN.

The NPPG indicates that if previous housing delivery has exceeded the minimum LHN, this level of delivery may be indicative of greater housing need (ID : 2a-010-20190220). It is noted that the adopted housing requirement is 500 dwellings per annum, which is above the minimum LHN and the 2019 Housing Delivery Test (HDT) results show housing delivery in the Borough in excess of this adopted housing requirement. Housing delivery was 1,010 dwellings in 2016/17, 863 dwellings in 2017/18 and 699 dwellings in 2018/19.

The minimum LHN may provide insufficient workers to align with forecast jobs growth. Jobs growth may generate a need for an increased labour supply to meet increasing employment demand, which will in turn lead to a need for new homes to accommodate the new population. The Council should not impede the economic growth agenda of the Borough. The 2019 EHDNA sets out the following alternative economic growth scenarios (without Partial Catch Up Rate Allowance incorporated) :-

- D – Cambridge Economics Baseline of 435 dwellings per annum ;
- E - Jobs Growth Policy On (Regeneration) of 647 dwellings per annum;
- F - Jobs Growth Past Trends of 683 dwellings per annum ; and
- G - Jobs Growth Jobs Boost of 540 dwellings per annum.

In the Borough, affordable housing need is calculated as between 252 dwellings per annum (based on 25% affordability threshold) and 389 dwellings per annum

(based on 33% affordability threshold). The NPPG sets out that households whose needs are not met by the market, which are eligible for one or more of the types of affordable housing set out in the definition of affordable housing in Annex 2 of the 2019 NPPF are considered to be in affordable housing need (ID : 67-005-20190722). The Council's affordable housing need should be calculated based on this definition. The NPPG also states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID : 2a-024-20190220). Affordable housing needs in Stafford are significant in comparison to the minimum LHN representing between 62% and 95% respectively. It is also noted that affordable housing delivery between 2013/14 – 2018/19 was only 193 dwellings per annum. It is acknowledged that the Council may not be able to meet all affordable housing needs but an uplifted housing requirement figure above the minimum LHN will make a greater contribution towards meeting affordable housing needs.

The new Local Plan should be prepared through joint working on cross boundary. As set out in the 2019 NPPF, the new Local Plan should be positively prepared and provide a strategy, which as a minimum seeks to meet its own LHNs in full and is informed by agreements with other authorities, so that any unmet need from neighbouring areas is accommodated (para 35a). Stafford adjoins eight other authorities namely Stoke on Trent, Newcastle under Lyme, Telford & Wrekin, Shropshire, South Staffordshire, Cannock Chase, East Staffordshire and Staffordshire Moorlands. As set out in the NPPG, an agreed position on housing needs should be set out in a Statement of Common Ground (SoCG) signed by these respective authorities (NPPG ID : 61-010-20190315). This SoCG should be publicly available by the time of publication of a Draft Plan (ID : 61-020-20190315).

In Stafford, there is justification for a housing requirement above the minimum LHN. The testing of economic growth scenarios demonstrates that the lowest uplifted housing requirement should be no less than 540 dwellings per annum however this is unlikely to help delivery of much needed affordable housing as it is only 40 dwellings per annum above the adopted housing requirement. The Jobs Growth Policy On scenario of 647 dwellings per annum is below the Jobs Growth Past Trends (13,126 jobs), which is considered unsustainable over the long term, but aligns with the Council's proposals for a New Community & Stafford Station Gateway. A housing requirement of at least 647 dwellings per annum would also make a greater contribution towards delivery of affordable housing. Since 2016/17, housing delivery has averaged 857 dwellings per annum therefore a housing requirement even greater than 647 dwellings per annum would be deliverable. Indeed, a housing requirement up to 700 dwellings per annum would still be below 40% cap above the adopted housing requirement.

**Question 5.A.b) Should a partial catch up rate allowance be incorporated?**

The 2019 EHDNA tests the incorporation of a partial catch up rate allowance because the propensity for younger people in the Borough to form a head of a household is lower than the national average. The incorporation of a partial catch up rate allowance should be approached with caution in order to avoid accusations of double counting. In the standard methodology, the affordability adjustment is applied as household growth on its own is insufficient as an indicator of future housing need because if household formation is constrained to the supply of available properties new households cannot form if there is nowhere for them to live (NPPG ID : 2a-006-20190220). Interested parties seeking the lowest possible housing requirement figure may interpret the incorporation of a partial catch up rate allowance as an unnecessary doubling up of the function of the affordability adjustment.

A housing requirement above the minimum LHN as advocated by the HBF in answer to Question 5.A.a) above is a positive contribution towards assisting more household formation in younger age groups.

**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)?**

The HBF is concerned that Question 5.C. confuses the housing requirement figure and Housing Land Supply (HLS) together. In the new Local Plan, there should be a clear distinction between the housing requirement and HLS. There should be no discounting of the housing requirement figure for newly built dwellings completed since the start of the plan period. The Council's HLS should separately identify completions and adopted allocations.

**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?**

The HBF agree with the basis for the preparation of the Settlement Hierarchy and the inclusion of smaller settlements.

**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?**

The Council has identified the following potential spatial scenarios :-

- The intensification of development in towns and district centres ;
- The dispersal of development ;
- Garden Communities ;
- The intensification of development around the edges of larger settlements and strategic extensions ; and

- “String” or “Wheel” settlement clusters.

These spatial scenarios are considered to be reasonable options.

**b) Are there any of these spatial scenarios that you feel we should avoid? If so, why?**

The new Local Plan’s strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver the Borough’s housing requirement. This sufficiency of HLS should meet the housing requirement, ensure the maintenance of a 5 Years Housing Land Supply (YHLS) and achieve HDT performance measurements.

There are disadvantages to the spatial scenarios if pursued in isolation by the Council. The availability of brownfield sites would be insufficient to only pursue an intensification of town and district centres scenario. The long lead-in time associated with delivery of Garden Communities would not provide a sufficient pre-2030 HLS.

**c) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer**

A combination of all spatial scenarios is considered best for the reasons outlined in HBF answer to Question 5.F.c) above.

The dispersal of development spatial scenario will support local communities. 39% of the Borough’s population live in smaller market towns, rural villages and hamlets. In the Borough, house prices have increased since the recession, today median and lower quartile house prices are higher than the Staffordshire average. Affordability ratios have worsened. Lower quartile affordability ratios are worse than median ratios, so households on lower incomes may struggle to afford even lower priced properties. Generally, median house prices are higher in the rural areas of the Borough than in the towns of Stafford or Stone.

The Council’s overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market. Under the 2019 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than

one hectare or else demonstrate strong reasons for not achieving this target (para 68).

**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)?**

The Council has identified the following Growth Options :-

- Option 1 - Stafford & Stone only focussed development ;
- Option 2 – Stafford, Stone & Key Service Villages ;
- Option 3 – Dispersed development across new settlement hierarchy ;
- Option 4 – all new development Garden Communities only ;
- Option 5 – dispersed and new community ; and
- Option 6 – settlements linked by existing transport corridors.

For the reasons outlined in HBF answers to Questions 5.D.i), 5.D.ii), 5.F.a), 5.F.b) and 5.F.c), the HBF does not favour Options 1, 2 and 4.

Under Options 3, 5 and 6, the dispersal of development is critical. If the Council is to avoid replicating Options 1 and 2, which are considered by the Council as non-compliant with the 2019 NPPF, then growth must be distributed at the lower end of the identified range in Stafford / Stone and the upper end of the identified range in North Stafford Urban Area, large, medium and small settlements.

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

- 1. Growth Option Scenario ;**
- 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? Please explain your answer.**

A combination of Growth Options for dispersed development across new Settlement Hierarchy (including smaller settlements), at Garden Community / major urban extensions and within existing transport corridors should be put forward as the Council's Preferred Option. The qualitative distribution of growth will be critical to diversifying HLS, optimising housing delivery and supporting local communities (see HBF answers to Questions 5.D.i), 5.D.ii), 5.F.a), 5.F.b), 5.F.c) and 5.H.i) above).

The Council should be cautious about applying a partial catch up allowance (see HBF answer to Question 5.B.b) above).

All sources of HLS including completions and existing allocations should be accounted for (see HBF answer to Question 5.C. above).

**5.O. Are there any additional sites over and above those considered by the SHELAA that should be considered for development?**

The HBF would not wish to comment on the merits or otherwise of individual sites identified in the SHELAA but it is critical that the Council's assessment of availability, suitability, deliverability, developability and viability are correct. The Council's assumptions on lapse rates, non-implementation allowances, lead in times and delivery rates contained within its overall HLS, 5 YHLS and housing trajectory should be realistic and supported by relevant parties including landowners, promoters and developers.

**Section 8 - Delivering Housing**

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

The determination of the efficient use of land should be undertaken in accordance with the 2019 NPPF (para 123c).

**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: the implementation of a blanket density threshold; or a range of density thresholds reflective of the character of the local areas to be preferable? Why do you think this?**

The setting of residential density standards in the new Local Plan should be undertaken in accordance with the 2019 NPPF (para 123), whereby in the circumstances of an existing or anticipated shortage of land for meeting identified housing needs then a minimum net density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate.

A blanket approach to housing density across the Borough is unlikely to provide a variety of typologies to meet the housing needs of different groups. A range of density standards specific to different areas of the Borough is necessary to ensure that any proposed density is appropriate to the character of the surrounding area. Housing mix and density are intrinsically linked and the inter-relationship between density, house size (any implications from the introduction of optional space and accessible / adaptable homes standards), house mix and developable acreage should be considered holistically in viability assessment testing.

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

It is appropriate to encourage the development of higher densities in suitable locations such as in town / city centres and locations with good accessibility to public transport. However, if a minimum residential development density is adopted, then consideration on a case by case basis should be permissible to determine if a lower density is appropriate in that location.

**Question 8.D. Do you consider that the adoption of the Nationally Described Space Standards (NDSS) would work to increase housing standards, and therefore enhance the health and wellbeing of local residents in Stafford Borough?**

The new Local Plan should not adopt NDSS (see HBF answer to Question 8.E. below).

**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.**

The Council should not apply the NDSS. If the Council wishes to apply the optional NDSS to new build dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46). Footnote 46 states that *“policies may also make use of the NDSS where the need for an internal space standard can be justified”*. As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that *“where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing”* (ID: 56-020-20150327). Before adopting the NDSS, the Council should provide a local assessment evidencing the case for Stafford. If it had been the Government’s intention that generic statements justified adoption of the NDSS then the standard would have been incorporated as mandatory in the Building Regulations, which is not the case.

The NDSS should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as *“requiring something because it is essential or very important rather than just desirable”*. The identification of a need for the NDSS must be more than simply stating that in some cases the standard has not been met, it should identify the harm caused or may be caused in the future.

The HBF is not aware of any evidence that market dwellings not meeting the NDSS have not sold or that those living in these dwellings consider that their housing needs are not met. There is no evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings. The HBF in

partnership with National House Building Council (NHBC) undertake an annual independently verified National New Homes Customer Satisfaction Survey. The 2019 Survey demonstrates that 91% of new home buyers would purchase a new build home again and 89% would recommend their housebuilder to a friend. The results also conclude that 93% of respondents were happy with the internal design of their new home, which does not suggest that significant numbers of new home buyers are looking for different layouts or house sizes to that currently built.

As set out in the 2019 NPPF, the Council should understand and test the influence of all inputs on viability. The cumulative impact of infrastructure, other contributions and policy compliant requirements should be set so that most sites are deliverable without further viability assessment negotiations (para 57). The deliverability of the Local Plan should not be undermined (para 34). The Council should prepare a viability assessment in accordance with guidance to ensure that policies are realistic and the total cost of all relevant policies are not of a scale that will make the Local Plan undeliverable (ID : 61-039-20190315).

The requirement for NDSS reduces the number of dwellings per site therefore the amount of land needed to achieve the same number of dwellings must be increased. The efficient use of land is less because development densities have been decreased. At the same time, infrastructure and other contributions fall on fewer dwellings per site, which may challenge viability, delivery of affordable housing and release of land for development by a willing landowner especially in lower value areas and on brownfield sites.

There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The impact of adopting NDSS on affordability should be assessed. The Council cannot simply expect home buyers to absorb extra costs. Over the last two decades housing affordability in the Borough has worsened. In 1997, the median affordability ratio was 3.84, which has almost doubled by increasing to 7.35 in 2019.

The Council should recognise that customers have different budgets and aspirations. An inflexible policy approach for NDSS for all dwellings will impact on affordability and effect customer choice. The introduction of the NDSS for all dwellings may lead to customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs. A future purchaser needing a 2 bedroomed home may only be able to afford a 2 bed / 3 person dwelling of 70 square metres with one double bedroom and one single bedroom rather than 2 bed / 4 person dwelling of 79 square metres with two double bedrooms. This may lead to the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. Non-NDSS compliant dwellings may be required to ensure that those on lower incomes can afford a property, which meets their bedrooms requirements.

It is possible that additional families, who can no longer afford to buy a NDSS compliant home, are pushed into affordable housing need whilst the Council is undermining the delivery of affordable housing.

The Council should assess any potential adverse impacts on meeting demand for starter homes / first-time buyers because the greatest impacts are on smaller dwellings, which may affect delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be determined by market affordability at relevant price points of dwellings and maximising absorption rates. An adverse impact on the affordability of starter home / first time buyer products may translate into reduced or slower delivery rates.

If the NDSS is adopted, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date.

**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?**

As set out in 2019 NPPF, the housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). All households should have access to different types of dwellings to meet their housing needs. Market signals are important in determining the size and type of homes needed. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as self & custom builders and the elderly without seeking a specific housing mix on individual sites. The new Local Plan should ensure that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.

**Question 8.G. Do you consider the lack of smaller housing units to be an issue within the Borough of Stafford? If so, are there any areas where this is a particular problem?**

See HBF answer to Question 8.F. above.

**Question 8.H. Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?**

All new homes are built to Building Regulation Part M Category 1 (M4(1)) standards, which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at

accessible heights and downstairs toilet facilities usable by wheelchair users. These standards are not usually available in the older existing housing stock and benefit less able-bodied occupants. The optional standards should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as “*requiring something because it is essential or very important rather than just desirable*”. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case. M4(1) standards are likely to be suitable for most residents.

If the Council wishes to adopt the optional standards for M4(3) for 10% of affordable homes, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the NPPG. Footnote 46 states “*that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties*”. As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out the evidence necessary to justify a policy requirement for M4(3) standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327) to ensure that an appropriate evidence base is available to support any proposed policy requirements.

The optional standards should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as “*requiring something because it is essential or very important rather than just desirable*”. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.

The NPPG sets out that evidence should include identification of :-

- the likely future need ;
- the size, location, type and quality of dwellings needed ;
- the accessibility and adaptability of the existing stock ;
- variations in needs across different housing tenures : and
- viability.

Detailed information on the accessibility and adaptability of the existing housing stock, the size, location, type and quality of dwellings needed and variations in needs across different housing tenures in the Borough should be incorporated into the Council’s supporting evidence.

Many older people already live in the Borough. Many will not move from their current home but will make adaptations as required to meet their needs, some will choose to move to another dwelling in the existing stock rather than a new build property and some will want to live in specialist older person housing. The

existing housing stock is considerably larger than the new build sector so adapting the existing stock is likely to form part of the solution.

It is also important to note that not all health problems affect a household's housing needs therefore not all health problems require adaptations to homes.

The Council should take into account site specific factors such as vulnerability to flooding, site topography and other circumstances, which make a site unsuitable for M4(3) compliant dwellings (NPPG ID : 56-008-20150327).

The Council is also reminded that the requirement for M4(3) should only be required for dwellings over which the Council has housing nomination rights as set out in the NPPG (ID 56-008-20150327).

The Council's Viability testing should take full account of additional costs. In September 2014, the Government's Housing Standards Review included cost estimates by EC Harris, which were £15,691 per apartment and £26,816 per house for M4(3). The Council's own viability testing should include such costs plus inflationary increases since 2014. M4(3) compliant dwellings are larger than NDSS (see DCLG Housing Standards Review Illustrative Technical Standards Developed by the Working Groups August 2013) therefore larger sizes should be used when calculating additional build costs.

**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?**

See HBF answers to Questions 8.B. and 8.F. above.

**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?**

See HBF answers to Questions 5.B.a) and 8.F. above.

The Council should also clarify that affordable housing definitions will comply with the 2019 NPPF Glossary and affordable housing tenure mix will comply with 2019 NPPF (para 64).

**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?**

Under the 2019 NPPF, Designated Rural Areas are defined as National Parks, Areas of Outstanding Natural Beauty (AONB) and areas designated as “rural” under Section 157 of the Housing Act 1985. The Council should only require affordable housing on sites of less than 5 dwellings in the Cannock Chase AONB.

**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?**

Under the Self Build & Custom Housebuilding Act 2015, the Council has a duty to keep a Register of people seeking to acquire self & custom build plots and to grant enough suitable development permissions to meet identified demand. The NPPG (ID: 57-025-201760728) sets out ways in which the City Council should consider supporting self & custom build. These are :-

- developing policies in the City Plan for self & custom build ;
- using Council owned land if available and suitable for self & custom build and marketing such opportunities to entrants on the Register ;
- engaging with landowners who own housing sites and encouraging them to consider self & custom build and where the landowner is interested facilitating access to entrants on the Register ; and
- working with custom build developers to maximise opportunities for self & custom housebuilding.

The HBF is not supportive of policy requirements for the inclusion of 5% self & custom build housing on residential development sites of 100 or more dwellings, which only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. The Council should not seek to burden developers with responsibility for delivery of self & custom build plots contrary to national guidance, which outlines that the Council should engage with landowners and encourage them to consider self & custom build. The Council’s proposed policy approach should not move beyond encouragement by seeking provision of self & custom build plots as part of the housing mix on new housing development.

As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The Council’s Self & Custom Build Register alone is not a sound basis for setting a specific policy requirement. As set out in the NPPG, the Council should provide a robust assessment of demand including an assessment and review of data held on the Council’s Register (ID 2a-017-20192020), which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (ID 57-0011-20160401). The Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on housing sites. It is also possible for individuals and organisations to register with more than one Council

so there is a possibility of some double counting. The Register may indicate a level of expression of interest in self & custom build but it cannot be reliably translated into actual demand should such plots be made available.

The Council's policy approach should be realistic to ensure that where self & custom build plots are provided, they are delivered and do not remain unsold. It is unlikely that the provision of self & custom build plots on new housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health & safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. If demand for plots is not realised, there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council's HLS.

Where plots are not sold, it is important that the Council's policy is clear as to when these revert to the original developer. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development. The consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self & custom builders.

As well as on-site practicalities any adverse impacts on viability should be tested. It is the Council's responsibility to robustly viability test the new Local Plan in order that the cumulative impact of policy compliant requirements and other infrastructure contributions are set so that most development is deliverable without further viability assessment negotiations and the deliverability of the Local Plan is not undermined. The financial impacts from delayed delivery or non-delivery should be assessed.

There may also be a detrimental impact upon the level of affordable housing provision achieved on new housing developments because self & custom build dwellings are exemption from Community Infrastructure Levy (CIL) contributions and affordable home ownership provision as set out in national policy.

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

The HBF is supportive of proposals to encourage self & custom build for its potential additional contribution to overall HLS. The Council should allocate plots for self & custom build.

**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?**

It would be beneficial to allow self build only development within settlements of less than 50 dwellings. Any imposed local connection criterion should not be overly restrictive.

**Section 9 - Delivering Quality Development**

**9.J. Do you consider that the current “Design” Supplementary Planning Document (SPD) provides sufficient guidance for design issues in the Borough? Please explain your rationale.**

The Regulations are clear that development management policies, which are intended to guide the determination of applications for planning permission should be set out in the Local Plan. The Council should not devolve fundamental policy matters to an SPD. Where SPDs are prepared, they should be used to provide more detailed advice and guidance on the policies in the Local Plan and not as an opportunity to change or introduce the requirements of a policy. As defined in 2019 NPPF Glossary, an SPD is capable of being a material consideration in planning decisions but is not part of the Local Plan. The Regulations indicate that an SPD does not have statutory force. An SPD is defined as something that is not a Local Plan as it has not been subject to the same process of preparation, consultation and examination. The Council should not convey Local Plan status onto an SPD.

**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.**

The Council’s policy approach to “good” design should accord with the 2019 NPPF, the latest NPPG and the National Design Guide.

The HBF is supportive of the use of best practice guidance however the use of such guidance should remain voluntary rather than becoming a mandatory policy requirement, which developers are obliged to use as a pre-condition for the Council’s support.

**9.M. Do you consider the designation of sites as Local Green Space (LGS) to be necessary through the new Local Plan?**

The 2019 NPPF sets a significantly high bar for LGS designation and post designation managing LGS in line with Green Belt policy (paras 99 – 101). Accordingly, LGS designation should be viewed as an exception rather than the norm. The Council's approach in proposing any LGS designations in the new Local Plan should not become commonplace rather than of a limited and special nature. It is recognised that many proposed LGS will be important to local communities for informal recreational uses. Proposed LGS may also contain varying levels of wildlife, beauty and tranquillity however it should be evident that all proposed LGS are "*special*" and of "*particular local significance*" to distinguish them from other green open spaces in order to reach the high bar necessary for LGS designation.

## **Section 11 - Health and Wellbeing**

### **11.A.b) Or should an alternative approach to the integration of health and well-being issues into the New Stafford Borough Local Plan be adopted?**

The adopted Stafford Local Plan does not have a policy on health and wellbeing however the general expectations of the 2019 NPPF is that planning will promote healthy communities. The NPPG confirms that a Health Impact Assessment (HIA) can serve a useful purpose at planning application stage and consultation with the Director of Public Health as part of the process can establish whether a HIA would be a useful tool for understanding the potential impacts upon wellbeing that development proposals will have on existing health services and facilities (ID : 53-004-20140306).

If the Council adopts an alternative approach to the adopted Local Plan, any requirement for a HIA Screening Report and / or a full HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA Screening Report without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the NPPG. Only if a significant adverse impact on health and wellbeing is identified should a full HIA be required, which sets out measures to substantially mitigate the impact.

## **Section 12 - Connections**

### **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.**

The setting of local car parking standards should accord with the 2019 NPPF (paras 105 & 106). It is not necessary for the Council to specify provision of Electric Vehicle Charging Points (EVCPs) because of the Government's proposed changes to Building Regulations.

The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. Recently, the Department of Transport held a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7<sup>th</sup> October 2019).

This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in 2020. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M. The Government has estimated installation of such charging points add on an additional cost of approximately £976.

The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's recent consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades, which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.

**Question 12.E. 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.**

The Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations.

In the Budget (11<sup>th</sup> March 2020), the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government will amend Part R “Physical Infrastructure for High Speed Electronic Communications Networks” of the Building Regulations 2010 to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. By taking these steps, the Government intends to overcome any existing market failure.

The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy. The policy will apply to all to new builds. Any type of technology may be used, which is able to provide speeds of over 1000 Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator. The new measures will place responsibilities on both developers and network operators :-

- Developers will have to ensure new homes have gigabit broadband. This includes ensuring that the physical infrastructure necessary for gigabit-capable connections is provided on site for all new build developments and homes are connected by an operator to a gigabit-capable connection ;
- This requirement exists unless the cost to the developer of providing connectivity exceeds £2,000, or the operator declines to provide a connection ;
- Developers must seek a second quote from network operators, where the first quote suggests that gigabit-capable broadband cannot be installed within the cost cap ;
- If gigabit broadband exceeds the cost cap, the developer must provide connectivity to other technologies, which can provide at least superfast connection within the same cost cap, unless the operator declines to provide a connection ; and
- A commitment to contribute to the costs of connection by network operators. Virgin Media has committed to contributing at least £500, rising in the case of some larger sites to £1,000. Openreach has committed to a combined Openreach and Developer Contribution of £3,400, with a maximum developer contribution of £2,000.

As soon as Parliamentary time allows, the Government intends to lay the legislation to amend the Building Regulations. The supporting statutory guidance (Approved Documents) will also be published as soon as possible.

### **Conclusions**

For the Stafford Local Plan to be found sound under the four tests of soundness as defined by the 2019 NPPF (para 35), the Local Plan must be positively prepared, justified, effective and consistent with national policy. It is hoped that these responses are helpful to the Council in the next stages of Local Plan preparation. The HBF look forward to submitting further comments during future Local Plan consultations. In the meantime, if any further information or assistance is needed please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**

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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>		<b>Mrs</b>
<b>First Name</b>		<b>Amy</b>
<b>Surname</b>		<b>James</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Associate</b>
<b>Organisation (if applicable)</b>	<b>Seddon Homes</b>	<b>WSP   Indigo</b>
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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](mailto: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](http://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.

<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b> Amy James		<b>Organisation</b> WSP   Indigo			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	4A	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	4C	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

*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?**

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>4E</b>	<b>Other</b>	

**2. Please set out your comments below**

**Please refer to the enclosed report**

- 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.

<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b> Amy James		<b>Organisation</b> WSP   Indigo			
<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5A	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5B	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

*Please use a continuation sheet if necessary*

<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5C</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
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<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5D</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
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<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5E</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
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<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5F</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</p>					

<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5G</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</p>					

<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5H</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</p>					

<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5I</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</p>					

<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5J</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
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<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5K</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
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<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5L</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</p>					

<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5M</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</p>					

<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5N</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</p>					

<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5O</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5P</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

<b>2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5Q</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

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<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b> Amy James		<b>Organisation</b> WSP   Indigo			
<b>3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	8A	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

<b>3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	8B	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

*Please use a continuation sheet if necessary*

<b>3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8C</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

<b>3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8D</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

<b>3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8E</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

<b>3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8F</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

<b>3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8H</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
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<b>Figure</b>		<b>Question</b>	<b>8I</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

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<b>Figure</b>		<b>Question</b>	<b>8K</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
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<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>8N</b>	<b>Other</b>	
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<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b> Amy James		<b>Organisation</b> WSP   Indigo			
<b>4. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	9E	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

<b>4. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	9F	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

*Please use a continuation sheet if necessary*

<b>4. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9J</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</p>					

<b>4. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>9N</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</p>					

- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
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<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b> Amy James		<b>Organisation</b> WSP   Indigo			
<b>5. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	10A	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

<b>5. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	10C	<b>Other</b>	
<b>2. Please set out your comments below</b>					
Please refer to the enclosed report					

*Please use a continuation sheet if necessary*

- 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.

<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b> Amy James		<b>Organisation</b> WSP   Indigo			
<b>6. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	11A	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</p>					

<b>6. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	11B	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</p>					

*Please use a continuation sheet if necessary*

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<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b> Amy James		<b>Organisation</b> WS   Indigo			
<b>7. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	12D	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Please refer to the enclosed report</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-](http://www.staffordbc.gov.uk/new-local-plan-)

Please e-mail your comments (Preferred) to: [forwardplanning@staffordbc.gov.uk](mailto: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](http://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](mailto:forwardplanningconsultations@staffordbc.gov.uk)

# Land at Ash Flats, Stafford Town

Stafford New Local Plan – Issues and  
Options Consultation Representations

**Land at Ash Flats, Stafford Town**  
Stafford New Local Plan – Issues and  
Options Consultation Representations

April 2020

**WSP | Indigo**

wsp indigo.



# Land at Ash Flats, Stafford Town

## Stafford New Local Plan – Issues and Options Consultation Representations

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# 1. Introduction

- 1.1. We write in relation to the Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document February 2020 on behalf of Seddon Homes.
- 1.2. Seddon Homes has an interest in land at Ash Flats, Stafford. A Site Location Plan is enclosed at **Appendix 1**.
- 1.3. This report sets out representations towards the future growth options currently being considered by the Council as it progresses with preparing a new Local Plan.
- 1.4. There is strong support for Stafford being identified as a Tier 1 settlement that is capable of accommodating and delivering future residential development. To ensure that Stafford is able to continue acting as a “*regionally significant service centre*” and having “*a key role in driving growth*” as part of the new Local Plan, the settlement boundaries should be reviewed so that sufficient sites, in sustainable locations, such as land at Ash Flats, are able to come forward to meet housing needs.
- 1.5. As set out in greater detail throughout this report, land at Ash Flats represents a sustainable and deliverable site that is able to come forward in the short term and start delivering housing. The suitability of the site to accommodate future housing has already been thoroughly examined both at a Local Plan Examination and through a Planning Appeal. Whilst the site does not have an existing consent or an allocation, the reason for it not being progressed was one of timing, with the Council previously considering it had sufficient land to meet housing needs, not due to any technical matters.
- 1.6. Land at Ash Flats is a deliverable site ready to come forward and start making a valuable contribution to meeting housing needs. It forms a logical extension to Stafford Town with strong defensible boundaries. The site should, therefore, be included within the settlement boundary of Stafford Town and allocated for housing in the new Local Plan.
- 1.7. It is requested that these representations are taken into account as the new Local Plan progresses and that we are placed on the mailing list to receive updates on the various consultation stages of the Plan.

## 2. Sustainability and Climate Change (Questions 4A(A), C and 4E)

**Question 4A – 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 current statutory Building Regulations, in order to ensure that an optimum level of energy efficiency is achieved?**

- 2.1. Whilst it is acknowledged that reducing the effects on climate change is important, it is also important that any Local Plan policies are not overly onerous and deter sites coming forward for development, hindering their viability to deliver housing.
- 2.2. In addition, any Local Plan policies need to be properly justified and based on a sound evidence base.
- 2.3. Currently, it is unclear as to the justification for imposing targets which propose to go beyond Building Regulations. Therefore, at this stage seeking energy efficiency targets above Building Regulations is not a sound approach due to the lack of evidence to justify why this is an appropriate strategy.

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

- 2.4. As set out above, requirements to meet specific climate change targets do also need to be considered against potential impacts upon scheme viability to ensure housing schemes are not deterred from coming forward due to onerous requirements.
- 2.5. There should also be flexibility as to how individual schemes are able to contribute to responding to climate change and reducing carbon emissions. For example, there should be the ability for schemes to adopt a “fabric first” approach to reducing emissions. This approach looks at the thermal envelope of the building (enhanced insulation, construction technologies etc) to see what improvements/reductions can be achieved prior to any renewable/low carbon technologies being considered.

**Question 4E – Should the Council implement a higher water standard than is specified in the statutory Building Regulations?**

- 2.6. The response to question 4A(A) has already highlighted the issue of there being a lack of evidence to justify any policy requirements being above the standards/targets currently set out in Building Regulations.
- 2.7. Also, there is no evidence that imposing higher targets will be viable. As a number of the questions posed relate to suggesting obligations are imposed on new development there needs to be evidence to demonstrate that sites will be able to come forward viably if all obligations are imposed.

### 3. Development Strategy (Questions 5A – 5Q)

#### Question 5A

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

3.1. Yes.

**B) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate's view.**

3.2. No.

#### Question 5B

**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?**

- 3.3. Scenario F results in the most appropriate housing requirement figure to meet the Borough's future housing growth requirements.
- 3.4. We support the fact that scenarios A (standard method), B (baseline 2014) and C (mid-year estimates (MYEs) 2017) are not being progressed as possible future housing need scenarios.
- 3.5. The National Planning Practice Guidance (NPPG) (paragraph 2a-010-20190220) notes that *"the standard method for assessing local housing need provides a **minimum starting point** in determining the number of homes needed in an area"* (emphasis added). Therefore, to progress with a figure of only 408 dwellings per annum (dpa) (scenario A) would be contrary to national guidance.
- 3.6. Furthermore, paragraph 10.91 of the Economic Development and Housing Needs Assessment (EDHNA) notes that *"in order to support the future economic scenario for the Borough (which recognises the opportunities identified through the Stafford Station Gateway and a New Garden Community) the 408dpa standard methodology would provide insufficient housing to support this level of economic growth"*.
- 3.7. Similarly, scenarios B and C are contrary to national guidance as they are in fact suggesting an even lower level of housing growth than the standard method scenario. These scenarios should, therefore, be discounted.
- 3.8. The NPPG is clear there will be circumstances when a higher figure than that generated by the Standard Methodology might be considered. This is because the Standard Methodology does not attempt to predict the impact that future policies, changing economic circumstances or other factors might have on demographic behaviour. This can include specific growth strategies or strategic infrastructure improvements being in place or whether there is unmet need from neighbouring authorities. It also advises Local Planning Authorities (LPAs) to look at previous delivery levels and recent assessments of need (paragraph 21-010-20190220).
- 3.9. The current position in Stafford is one where there are clearly circumstances to go beyond the Standard Methodology figure; including the Councils' high level growth aspirations and opportunities to be realised once HS2 arrives in the Borough.

- 3.10. Of the remaining scenarios presented, it is considered that scenario F (past trends jobs growth) is the most appropriate scenario to be progressed to best meet Stafford's future housing growth requirements.
- 3.11. Whilst the EDHNA does indicate that current jobs growth rates are unlikely to be sustained, it also notes that it is uncertain times as a result of Brexit and changes might actually lead to more favourable economic conditions. The EDHNA (paragraph 10.75) highlights that stakeholders and Council officers have indicated an aspiration to grow the economy. On this basis, the Council will need to monitor and review job growth over the plan period to ensure that the level of housing requirement remains aligned with these high economic growth aspirations.
- 3.12. Section 9 of the EDHNA notes that the population of the Borough grew by 12.6% between 2001 and 2018. The number of households also rose steadily with an increase of 16.3% over the same period. Net internal migration increased to 1,025 in 2018, the highest level since before 2002. Net international migration fluctuated but has been positive over the last 10 years. However, the young working age population declined by 1.7%
- 3.13. The future housing requirement, therefore, needs to be sufficient to allow for increases in the population and also provide a range and mix of different housing sites to widen the choices available to the young working age population to try and reduce the decline of this sector of the population, who are important to feed into the economic growth strategy.
- 3.14. Scenarios D (Cambridge Econometrics (CE) baseline) and G (jobs growth – jobs boost) use the CE baseline data, however, are not based on actual trends. The EDHNA (pages 69/70) sets out some of the limitations associated with using the CE baseline data, which include it being less comprehensive and reliable at the local level as oppose to the national / regional level. The top / down forecasts do not take account of the direction of future growth within different sectors which can often be useful when assessing future land requirements within a local area. Therefore, Scenarios D and G do not fully reflect the needs and future aspirations of the Borough.
- 3.15. Whilst it is positive that scenario E (jobs growth – policy on) does seek to take account of future economic growth, we do not support it as it is based only on the anticipated economic growth from the new Garden Community / Settlement and Stafford Station Gateway. Even the EDHNA (paragraph 10.74) notes that this scenario does not reflect the Council's economic growth aspirations. Also, it will only start delivering housing and employment units by 2030 at the earliest, meaning there is a significant period where under the new Local Plan no development would be delivered.
- 3.16. The delivery of a new Garden Community / Settlement forms one of the six proposed growth options (discussed in the latter part of this section). There is no certainty at this stage that this will become the Council's preferred growth option. Therefore, basing the housing requirement on what is a hypothetical growth option which is still subject to a number of rounds of consultation is not a sound approach.
- 3.17. Housing needs should be based on a robust evidence base, not a hypothetical growth scenario. Also, it is unclear how progressing with scenario E would work if the New Garden Community / Settlement growth scenario was not progressed. This would mean that the housing needs figure would be based on the incorrect anticipated job growth level.
- 3.18. Scenario F, is therefore, the most appropriate strategy to progress as it is based on actual past trends and is reflective of what growth the Borough has actually been able to achieve over the last 18 years.

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

- 3.19. Due to the economic recession, which impacted upon headship rates and the ability of 15 –

34 year olds to form new households, the PCU Rates should be applied to any future housing requirement. If this isn't applied then the suppressed trends, which now do not necessarily reflect the current position, will be carried forward which is not in line with Government objectives of "*significantly boosting the supply of homes*" (NPPF, paragraph 59).

### Question 5C

**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.**

- 3.20. The starting point for establishing the housing requirement figure is to understand the housing need. As set out in the NPPG (paragraph ID: 2a-001-20190220), housing need is:
- "an unconstrained assessment of the number of homes needed in an area...It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations".*
- 3.21. In determining housing need, the NPPF expects the standard methodology to be applied; unless it is felt that circumstances warrant an alternative approach. Comments have already been provided in response to question 5B as to why a higher housing target is required.
- 3.22. It is acknowledged that there will be an overlap between the current and new Local Plans of circa 11 years (2020 – 2031). This means there will be existing commitments and allocations from the current Local Plan yet to come forward and be delivered during this overlap period. However, we do not support the suggestion that these commitments and existing allocations should automatically be discounted from any future housing requirement.
- 3.23. The new Local Plan should, therefore, set out a housing requirement target based on actual need over its plan period.
- 3.24. To avoid any double counting, it is then possible to determine the residual requirement of housing that needs to be delivered over the remainder of the plan period. This would enable any completions and justified commitments to be accounted for and discounted from the net housing need.
- 3.25. This is a moving feast, but it would be possible at the submission stage of the new Local Plan to calculate the housing needs being met by new completions and existing justified commitments/allocations and then subtract this from the initial housing needs requirement and identify what the residual housing need is that will need to be met through the new Local Plan.
- 3.26. However, such an approach would need to clearly define the methodology being applied and definitions being used to determine completions and which commitments/allocations should be taken into account in calculating the residual housing requirement.
- 3.27. These concerns are set out in the Issues and Options Paper (paragraph 5.12) noting that the LPA must be "*absolutely confident*" that any commitments to be discounted from the housing need requirement will be delivered (built out) within the timeframes of the current Local Plan.
- 3.28. Focusing particularly on the existing allocations, these were assessed, examined and

considered to be acceptable back in 2013/14. Therefore, if any, or parts thereof, of these allocations are to be carried forward as commitments in the new Local Plan, there will need to be sufficient evidence presented to demonstrate, with absolute confidence, that the remainder of these allocations will come forward before the end of the current plan period (ie 2031).

- 3.29. Whilst delivery rates for the Strategic Development Locations (SDLs) at Stafford North and West have increased and gathered pace over the last few years, levels of completions against the allocation requirement remain low. For example, the Northern SDL, out of a requirement to deliver 3,100 dwellings has 269 completed dwellings with an estimate that a further 926 will be delivered in the next five years. However, this still leaves 1,905 dwellings to be completed in the next 11 years.
- 3.30. Similarly, the Western SDL has a requirement for 2,193 dwellings and has completions totalling only 222 dwellings, with a further 452 dwellings expected in the next five years. Leaving 1,519 dwellings to be delivered before 30/31.
- 3.31. Based on the slow progress of the above two SDLs to date, there are significant question marks over whether the anticipated delivery rates will be achievable and whether indeed progress will continue to slow. Therefore, we do not support the discounting of 6,000 dwellings from the housing need target as there is no absolute certainty that all these dwellings will be delivered.
- 3.32. It is also worth noting that we are currently experiencing uncertain economic circumstances due to the Covid-19 pandemic. As a result of the Government's measures aiming to tackle Covid-19 the majority of housebuilders have put construction on hold and closed sales offices. These are unprecedented times and so far, it is unclear what impacts these measures will have going forward. However, there is a risk that housing delivery rates slow, therefore, increasing the demand. This raises further concerns of relying on a small number of existing allocations to meet future demand.
- 3.33. Finally, if this level of reduction was applied it would result in an annual housing requirement target of zero for the period of 2020 -2031 (as per table 5.2 of the Issues and Options Paper), which is unrealistic. Applying a growth target of zero would stagnate growth and could result in an undersupply of housing if there was any slippage in terms of the delivery rates of the commitments.
- 3.34. Notwithstanding the above, the housing need target is not to be viewed as a ceiling and there is the ability for sites coming forward that would go beyond the target to be assessed on individual merits in terms of ensuring there is sufficient social/physical infrastructure either in place or being provided to accommodate this extra growth. Therefore, the housing target should not be suppressed due to slow progressing existing allocations.

#### **Question 5D**

##### **i) Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?**

- 3.35. There is support for Stafford Town being identified as the Tier 1 settlement in the 2019 Settlement Hierarchy and this designation should be carried forward into the new Local Plan. Stafford Town has a central location and excellent connectivity to the strategic road network, making it a regionally significant service centre.

##### **ii) Do you agree that the smaller settlements should be included in the Settlement Hierarchy?**

- 3.36. N/A.

**Question 5E**

**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?**

3.37. N/A.

**Question 5F**

**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?**

3.38. In accordance with the requirement to consider reasonable alternatives, a number of different scenarios as to how the Borough could seek to grow in the future have been presented in the Issues and Options Paper.

**B) Are there any of these spatial scenarios that you feel we should avoid? If so, why?**

Option 1 – Intensification of Town and District Centres

- 3.39. Whilst there is support for focusing new housing development towards the existing major settlements, in particular Stafford Town, there is concern that under option 1 this new development would just be focused on the Town Centre and not the entire settlement.
- 3.40. By virtue of the fact the adopted Local Plan Part One had to locate allocate Stafford Town's future housing sites as three new SDLs demonstrates that there is limited availability for new residential development to be accommodated within the Town Centre, and indeed the current settlement boundaries of Stafford Town.
- 3.41. Focusing development solely on intensification of existing Town/District Centres, and in fact just within the confines of the existing Stafford Town settlement boundary, would not enable sufficient new housing sites to be identified and allocated and would not result in the Borough's housing needs being met.

Option 2 – Garden Communities

- 3.42. Detailed comments in relation to the proposed growth option of a new Garden Community / Village are set out in response to question 5G below.
- 3.43. In summary, there is concern that relying on a new Garden Community / Village to meet the Borough's housing needs is a high risky option. Such developments require significant infrastructure and investment to be able to come forward, which often means delivery rates are slow and are unable to meet housing demand. This is acknowledged in the EDHNA, which assumes construction on a new Garden Community / Village would not begin until 2030.
- 3.44. This has already been the case with two of the SDLs at Stafford Town, with the Issues and Options Paper stating:

*“Whilst the Strategic Development Locations (SDLs) at Stafford and Stone are now delivering the required level of development they have been slow to take off. This has been largely due to the levels of infrastructure required (notably in respect of Stafford West and Stafford North). This slow take off of strategic sites is similar to such developments elsewhere and needs to be factored into the make up of future allocated sites to ensure that the land supply can be properly managed” (paragraph 5.15).*

- 3.45. The Council is, therefore, clearly aware of the risks associated with relying on a small number of very large sites which need significant levels of infrastructure and acknowledge that this needs to be factored into future allocations.
- 3.46. Overall, the reliance on Garden Communities to meet future housing needs is not supported.
- 3.47. Notwithstanding this, regardless of whether or not a new Garden Community/major urban extension is progressed, it is clear that additional housing sites need to be identified that are able to come forward in the short term and start delivering housing, such as land at Ash Flats. The suitability of land at Ash Flats to deliver housing in the early stages of the new Local Plan period are set out in detail in response to question 50.

Option 5 – “String” settlement/settlement cluster and Option 6 – “Wheel” settlement cluster

- 3.48. Both of these options do seek to focus growth on key settlements, with option 6 specifically stating the development focus would be on Stafford and its surrounding settlements. There is support for the acknowledgment that Stafford should be a key focus to accommodate future development.
- 3.49. However, creating a “string” or “wheel” settlement relies on a specific pattern of broad locations / sites for future development being available and suitable. There is no evidence presented to demonstrate that there are deliverable / developable sites available for a “string” or “wheel” settlement or cluster to be delivered.
- 3.50. Whilst the intention seems to be the utilisation of existing linkages/corridors, this might not always be possible and if settlements were to grow these linkages may need improving. There is no explanation as to how and who would be responsible for funding any improvements or indeed new linkages between settlements.
- 3.51. There is also a risk that if either of these options were progressed, it could be at the expense of suitable and deliverable sites that are able to come forward in the short term and start delivering housing but which do not fall within any specific “string” or “wheel” settlement pattern. Both options are relying on sites within specific corridors, which there is no evidence to demonstrate are available, suitable etc to come forward, and would prevent other potential, more appropriate sites for being developed.

**C) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer**

- 3.52. There is support in principle for spatial options 3 (dispersal of development) and 4 (intensification around the edges of larger settlements and strategic extensions).

Option 3 – Dispersal of Development

- 3.53. Whilst it is acknowledged that smaller settlements within the Borough would benefit from new growth and development opportunities, to accord with the Settlement Hierarchy, this should not be at the expense of development being focused towards key settlements such as Stafford Town.
- 3.54. Stafford is described in the Proposed Settlement Hierarchy 2019 as having “a regionally significant service centre role...and providing a key role in driving growth” (Issues and Options Paper, table 5.4). Therefore, it should remain the key focus for future housing development.
- 3.55. This option would allow growth to be distributed across the Borough, but retaining a key focus on the key, tier 1 settlement of Stafford, which is supported, given the significant attributes Stafford has to accommodate future growth and development.

Option 4 – Intensification around the edges of larger settlements and strategic extensions

- 3.56. There is support for the fourth spatial option. This option has been applied in the current Local Plan Part One with the three SDLs identified to deliver the housing need and whilst the SDLs at Stafford North and Stafford West have been slow to come forward, the smaller SDL at Stafford East has delivered the majority of its housing.
- 3.57. Therefore, there is existing evidence to demonstrate that intensification around the edges of settlements such as Stafford Town has been successful. However, what needs to be considered is that this intensification happens in appropriate locations. For example, extending Stafford further northwards could lead to urban sprawl, as there are limited boundaries which can enclose future development. Whereas extending Stafford southwards would not result in urban sprawl as there are clear boundaries to enclose development. Land at Ash Flats is a clearly contained parcel of land, beyond which is the Borough boundary. Therefore, developing this site for housing would not lead to unending encroachment into the countryside which is a risk with extending Stafford further northwards.
- 3.58. The expansion sites identified need to be of sufficient scale to enable these to come forward in the short term without the need for significant infrastructure investment, such as land at Ash Flats.

**Question 5G - 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.**

- 3.59. The Council should not be reliant on the utilisation of a new garden village/major urban extension (or combination) to satisfy the Borough's housing needs.
- 3.60. The NPPF does note that in some instances delivering sufficient housing can sometimes be achieved through planning for large scale development, such as new settlements or significant extensions to existing villages/towns. However, it's clear that this is provided *"they are well located and designed and supported by the necessary infrastructure and facilities"* (paragraph 72).
- 3.61. Work has been carried out by AECOM (Strategic Development Site Options, December 2019) assessing a number of the potential garden village/major urban extensions being considered. It sets out that current estimates to provide the necessary physical infrastructure required as part of the delivery of the garden village/major urban extension, costs are likely to be in the region of £45,000 per home to £55,000 per home. Furthermore, of the two options identified as being 'potentially most suitable', the Strategic Development Options still concludes that this is dependent upon the provision of significant public transport infrastructure.
- 3.62. This indicates that there is not currently the necessary infrastructure / facilities to support the delivery of garden villages/major urban extensions. Instead delivering these sites will be dependent on significant funding / investment. On this basis, it would be a highly risky and unsound strategy to rely on a new garden village/major urban extension to meet the housing needs of the Borough, especially if this was at the expense of other housing sites coming forward.
- 3.63. Furthermore, even the Issues and Options Paper acknowledges that there will be significant lead in times required to deliver any new settlement, stating:

*"owing to the lead in time and the significant infrastructure required to*

*deliver any new settlement, it would not be able to deliver any new housing until very late into the plan period (2030 approximately). Therefore, sufficient land will need to be allocated in the Local Plan, to ensure that the Council has a rolling five year land supply throughout the Plan period" (paragraph 5.52).*

- 3.64. This reflects the current position of the slow delivery rates being experienced on the Northern and Western SDLs allocated in the Local Plan Part One (detailed at paragraph 3.30 and 3.31). In summary, the Northern SDL has delivered only 8% of its total requirement and the Western SDL has only met 10% of its target.
- 3.65. In addition to the above, none of the proposed garden village/major urban extension sites are located close to Stafford Town. Therefore, relying solely on the garden village/major urban extension to satisfy the Council's housing needs is contrary to the Proposed Settlement Hierarchy 2019 (table 5.4 of the Issues and Options Paper) which sets Stafford as the Tier 1 Settlement noting it will have a key role in driving growth.
- 3.66. Regardless of whether or not a new garden village/major urban extension is progressed, it is clear that additional housing sites need to be identified that are able to come forward in the short term and start delivering housing, such as land at Ash Flats. The suitability of land at Ash Flats to deliver housing in the early stages of the New Local Plan period are set out in detail in response to question 5O.

#### **Question 5H**

**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?**

#### Growth Option 1: Stafford and Stone focused development

- 3.67. There is support for seeking to focus future development towards Stafford and Stone. As set out above, focusing and delivering new development in Stafford aligns with the Council's proposed settlement hierarchy of this being the Tier 1 Settlement.
- 3.68. The Issues and Options Paper notes that this option would require significant urban extensions to Stafford and Stone as well as identifying a range of medium and small sites. The land at Ash Flats represents such a site which can assist with delivering new housing opportunities to Stafford Town in the short term.
- 3.69. It is acknowledged that purely focusing on Stafford and Stone as the sole means of delivering new housing is unlikely to meet the Borough's housing needs over the plan period. Also, it is appreciated that the NPPF does seek to support the opportunities for villages to grow and thrive.
- 3.70. The future growth strategy selected needs to be positively prepared and justified and also consistent with national policy. Therefore, whilst there is support for focusing a significant proportion of new development towards Stafford, growth opportunities will also need to be identified within other smaller settlements. However, this should not be at the expense of deliverable sites such as land at Ash Flats, being able to come forward.

#### Growth Option 2: Stafford, Stone and Key Service Village focused development

- 3.71. Similarly to the response to Growth Option 1, there is support for identifying Stafford as being the key focus for the majority of future development. It is a regionally significant

service centre and provides a range of employment, retail and other facilities. However, as already set out due to the fact that the Local Plan Part One had to identify SDLs to deliver Stafford Town's housing needs, additional sites adjacent to the settlement will need to be identified going forward; such as Land at Ash Flats.

Growth Option 3: Disperse development across the new settlement hierarchy

- 3.72. This option also aligns with the Council's proposed settlement hierarchy by still seeking to focus the greatest levels of growth to Stafford, with the Issues and Options noting this would be achieved through urban extensions and urban regeneration alongside allocating a number of medium and small sites. It is also consistent with the NPPF. This Growth Option is supported.
- 3.73. Although the SDLs at Stafford North and West have been slow to come forward, the smaller SDL at Stafford East has progressed well and is close to delivering its full quantum of development. This demonstrates that smaller urban extensions, such as that which land at Ash Flats could offer, which are not reliant on significant levels of investment and new infrastructure can deliver in the short/medium term.
- 3.74. Progressing with this option would be based on a growth strategy with a proven track record.
- 3.75. Current policy apportions 70% of new housing towards Stafford Town and there is no evidence to suggest it can no longer sustain a similar, if not higher level of growth. Therefore, whilst there is support for this growth option, the level of development focused towards Stafford Town should not be reduced as this would not align with the high growth aspirations and the fact Stafford Town is the regionally significant service centre.

Growth Option 4: Focus all new development at the new Garden Community

- 3.76. There is strong objection to proposed Growth Option 4. Focusing all new development in a new Garden Community with no other development elsewhere across the Borough is contrary to both the Council's proposed settlement hierarchy and vision and also the NPPF.
- 3.77. This option risks the Council not being able to meet the Borough's housing needs over the first half of the plan period. The Issues and Options Paper openly acknowledges that due to lead in times and the significant infrastructure required to deliver a new Garden Community it would not start delivering any new housing until very late into the plan period, post 2030 at least.
- 3.78. As set out above, the delivery of the SDLs at Stafford North and West have been slower than anticipated to come forward. Therefore, this places uncertainty that such a large new settlement which requires substantial and significant new infrastructure would be able to deliver as quickly as envisaged.
- 3.79. Paragraph 5.52 of the Issues and Options concludes "*therefore, sufficient land will need to be allocated in the Local Plan, to ensure that the Council has a rolling five year land supply throughout the Plan period*" (paragraph 5.52).
- 3.80. The fact this option would not identify a sufficient supply and mix of specific, deliverable sites for years one to five of the plan period is contrary to the provisions of the NPPF (paragraph 67).
- 3.81. Progressing with this option would be an unsound approach. It should, therefore, be discounted as a future growth option.

Growth Option 5: Disperse development across the new settlement hierarchy and also at the new Garden Community

- 3.82. Whilst Growth Option 5 still includes proposals for a new Garden Community, it is positive

that it also acknowledges the need for additional sites be allocated to ensure sufficient housing is delivered. The concerns with relying on a new Garden Community have already been set out above and in response to questions 5F and 5G so, therefore, are not repeated here.

- 3.83. In terms of the additional sites this growth option is suggesting are required, these will need to be deliverable sites, which are available, suitable and can come forward within the short term, such as land at Ash Flats. This is because it is anticipated that the new Garden Community can deliver housing in the latter part of the plan period so the shortfall will be at the start of the plan period. Identifying only long term sites will not result in the housing needs of the Borough being met and the Council will be unable to demonstrate a rolling five year supply of housing, as required by the NPPF.
- 3.84. However, there is concern that progressing with this option would see a reduction in the apportionment of new development directed towards Stafford Town. Given the level of services and existing infrastructure that Stafford Town has to offer it should continue to be the key focus for future development.

Growth Option 6: Concentrate development within existing transport corridors/cluster communities

- 3.85. There is support for this growth option in terms of its aim to maximise the potential for new infrastructure by building within and adjacent to larger settlements, such as Stafford Town. Utilising sites adjacent to settlements, such as land at Ash Flats, reduces the pressure for significant investment being required to bring sites forward for development.
- 3.86. There is limited evidence that sites within and along the suggested corridors/clusters are able to come forward, particularly in the short term to meet housing needs in the early part of the plan period. Therefore, there is support for the acknowledgment that as part of this option *“it would be likely to additionally require development within the main towns and other larger settlements within the settlement hierarchy”* (Issues and Options Paper, paragraph 5.60).
- 3.87. Similarly to the response to Growth Option 5, there is concern that relying on sites, not yet identified, along transport corridors could be at the expense of the level of future development apportioned to Stafford Town, which is not supported. For Stafford to continue its role as a regionally significant service centre it needs to be the key focus for future development.

**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.**

- 3.88. N/A

**Question 5I**

**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.**

- 3.89. The concern with relying on at least one Garden Community to deliver Stafford’s future development needs are the uncertainties associated with the actual deliverability and developability of such large new settlements in both timescales, funding and supporting infrastructure.
- 3.90. The most advanced option at this stage relates to land at Meecebrook. However, the funding secured so far is only to progress with initial feasibility studies to see if indeed progressing with a garden village in this location would be viable and feasible. Therefore, to

decide now that this will be a sound option for meeting the Borough's future development needs is not a justified approach, given the evidence is not yet available to confirm it is a feasible option.

- 3.91. Progressing with a new Garden Community growth option should not be at the expense of the development and growth of the rest of the Borough. For example, Stafford Town should continue to be the focus for future development in order to continue fulfilling its role as a regionally significant service centre. The proposed growth options suggest that a new Garden Community could reduce the amount of housing directed towards Stafford; this is not supported. If a new Garden Community is to be largely self sufficient then reducing the level of housing directed towards Stafford risks the Tier 1 settlement not meeting the growth aspirations envisaged by the Council.
- 3.92. Further comments relating to the concerns of progressing and relying on a Garden Community / Garden Village to meet the future development needs of the Borough are also set out in response to questions 5F, 5G and 5H so are not repeated here.

**Question 5J - 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? Please explain your answer.**

- 3.93. As already set out in response to earlier questions above, in terms of the Growth Option Scenarios, it is considered that scenario F (past trends job growth) represents the most appropriate economic scenario upon which to determine future growth targets. In summary, this scenario is based on actual levels of growth that the Borough has been able to sustain and deliver over recent years. It is based on actual evidence.
- 3.94. With regards to the PCU, as per the response to question 5B, this should be taken into account given the suppressed level of household formation rates in previous years.
- 3.95. We do not support imposing a discount to the housing requirement based on the potential overlap between the delivery of existing allocations and the start of the new Local Plan. There are uncertainties relating to the overall delivery rates of the remaining allocations and relying on these to deliver the housing needed in the first part of the new Local Plan period would be a high risk strategy. Furthermore, applying a discount would result in a housing target of zero for the start of the plan, which is an unrealistic target and does not align with the Government's objectives of significantly boosting housing.
- 3.96. Finally, the concerns relating to the reliance of using a new garden community to meet the Borough's housing needs have been expressed in response to a number of the questions above. In summary, the key issue relates to the fact such sites would not start to deliver housing until at least 2030 resulting in a shortfall in delivery in the early part of the plan period and secondly the uncertainty associated with such sites actually coming forward within the anticipated timescales.
- 3.97. In summary, we consider Growth Scenario F, with a PCU, no discount and no garden community should be the option progressed.

**Question 5K**

**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?**

3.98. N/A.

**Question 5L**

**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.**

3.99. N/A.

**Question 5M**

**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?**

3.100. N/A.

**Question 5N**

**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.**

3.101. N/A.

**Question 5O**

**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\* [\\*https://www.staffordbc.gov.uk/node/227026](https://www.staffordbc.gov.uk/node/227026)**

3.102. These representations are submitted as part of the promotion of land at Ash Flats. The site is already included within the SHELAA and has been given reference STAFMB03.

3.103. Positively the site is identified as being available and achievable and in terms of suitability is only scored down because it is currently adjacent to a sustainable settlement as oppose to within the settlement boundary. The SHELAA estimates the site has capacity to delivery 314 dwellings.

3.104. The site is a logical extension to Stafford Town and provides an excellent opportunity to widen housing choice in the Town and across the Borough. It is well contained due to existing development to the north (residential) and east (commercial) and the presence of the M6, Stafford to Birmingham railway and the A449 main road. The fact the site is well contained with strong physical boundaries, means that its development would not encroach into the open countryside. This is a significant benefit of developing this site as oppose to other areas surrounding Stafford which are not as well contained.

3.105. In accordance with Annex 2 of the NPPF, for a site to be considered deliverable it 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.

3.106. The Ash Flats site is a deliverable site and meets the criteria set out in the NPPF, as demonstrated below:

Availability

3.107. The site is available now. It has no ownership issues and is actively being promoted for development. There are no land ownership constraints that would hinder the delivery of

development at the site.

#### Suitability

- 3.108. The site is a suitable site for residential development that can be brought forward now and start delivering housing to assist in meeting the short-term demand.
- 3.109. The suitability of the site has already been assessed through both a Local Plan Examination and a Planning Appeal. Whilst the site was not progressed as an allocation or granted planning permission for housing, this was down to a matter of timing as opposed to there being any technical constraints or restrictions that would prevent development coming forward.
- 3.110. By way of summary, an outline planning application with all matters reserved except for means of access for up to 320 dwellings (ref: 13/19524/OUT) was refused in 2014. The reason for refusal was on the basis that the proposed development is on greenfield land outside the residential development boundary of Stafford and given there was a sufficient supply of housing was contrary to the development plan.
- 3.111. An appeal was lodged (APP/Y3425/A/14/2217578) and subsequently dismissed in December 2014.
- 3.112. In dismissing the appeal, the Inspector concluded that the proposals were contrary to the development plan, in particular Plan for Stafford Borough (PSB) policy SP7, due to the fact the site was identified as open countryside.
- 3.113. Whilst the Inspector did note that geographically the site was located within the countryside, it was acknowledged *“the M6 and the railway are in themselves dominating linear features that sharply define the whole of the appeal site by forming significant boundaries between it and the largely rural area beyond”* (paragraph 18 of the Appeal Decision). This reinforces the fact that whilst the site is currently outside of the settlement boundaries, it should not be considered “rural” in character, and therefore, including it within revised settlement boundaries as part of the new Local Plan would not be detrimental to the countryside area surrounding Stafford.
- 3.114. Also, there are a number of bus stops located within close proximity of the site which offer regular journeys into Stafford Town Centre, providing easy access to a significant range of services and facilities.
- 3.115. Furthermore, the Inspector concludes that there is no evidence to suggest that any special character features (for example important open spaces and views, heritage assets etc) would be adversely impacted upon by the proposed development.
- 3.116. Overall, the Inspector concluded *“I have no evidence sufficient to persuade me that the site is in an inherently unsustainable location”* (paragraph 104).
- 3.117. Positively, in terms of quantum of development, the Inspector noted that no evidence had been presented to demonstrate that the site could not accommodate 320 dwellings and that the reserved matters process provides adequate provision to assess this and ensure acceptable design standards were met.
- 3.118. With regards to other matters, the Inspector concluded that whilst a range of objections had been raised by third parties, it was clear from the Council Officer’s Report and the Planning Statement of Common Ground *“there are no ‘technical’ objections from relevant consultees. Moreover, there are no concerns or qualifications from such sources that could not be addressed by scheme design at reserved matters stage and/or the imposition of planning conditions, together with the execution of an appropriate form of planning obligation, and I am content that impacts on the amenity of adjacent residents can adequately be addressed through design and relevant conditions”* (paragraph 99).

- 3.119. Whilst the survey information carried out to support the application and appeal will need to be updated, the suite of documents submitted do demonstrate the suitability of the site for residential development and evidence that there are no technical constraints present that would prevent or even delay the delivery of housing at the site. Copies of this information can be shared if required.
- 3.120. The site was also promoted as a potential housing site in the Local Plan Part Two. However, the Local Plan Inspector concluded that he was satisfied that the level of flexibility already provided for by sites within settlement boundaries to meet housing needs was appropriate for the effectiveness of the plan. As a result, the Local Plan Part Two did not make any specific allocations for additional housing sites.
- 3.121. Notwithstanding this, the Local Plan Inspector did provide comments on some of the individual sites being promoted. With regards to the Ash Flats site specifically, the Local Plan Inspector noted:
- “it is sustainably located, subject to appropriate mitigation from the significant noise impacts of both the two highways (especially the M6) and the railway. It is my view, however, that the strategic housing requirements of PSB1 can be provided satisfactorily without recourse to developing new homes on this site. I therefore consider that the site is not needed now, and for this reason the settlement boundary does not need to be changed”.*
- 3.122. The Local Plan Inspector echoes the comments from the Inspector determining the appeal in that the site is sustainable and suitably located to accommodate housing. The Local Plan Inspector notes this is subject to mitigation from noise impacts, however, based on the fact noise was not an issue raised as part of the application and appeal at the site demonstrates it can be suitably mitigated and is not a constraint that would prevent development from coming forward.
- 3.123. It is acknowledged that a small part of the site is located within the flood zone, however, this is situated in the southern most part of the site and applying the sequential approach to the location of development still leaves the majority of the site available for development. This is not and previously was not a constraint preventing the development of the site. It is a matter that can be easily mitigated.

#### Achievability

- 3.124. Given there are no availability or suitability issues associated with the site, there are no site-specific reasons for the site not being able to deliver housing in the short term.
- 3.125. The site is also of a sufficient size to be able to deliver a wide range of different housing types, sizes and tenures to meet the different needs of the local community.
- 3.126. Based on the above, it is clear that the site is sustainable and suitable and able to deliver a wide range of housing within the short term. Therefore, it should be identified as a future housing allocation within the new Local Plan.

#### **Question 5P**

**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.**

- 3.127. N/A.

**Question 5Q**

**Do you agree with the methodology used to define settlement boundaries? If not, please provide reasons for your response.**

- 3.128. There is support for the acknowledgment in the Issues and Options Paper, that in reviewing and determining settlement boundaries areas of land which are physically related to the settlement will be considered. As set out above, land at Ash Flats is well related to existing built form and is surrounded by defensible boundaries which could be used to form the revised settlement boundary of Stafford Town.
- 3.129. Alongside considering the landscape and character of the settlement and its surroundings, consideration should also be given to the overall deliverability of a site, including its availability and achievability. These are two points which are not currently mentioned in the methodology proposed to define future settlement boundaries but are important factors to be taken into account.
- 3.130. Whilst it is appreciated that at this stage the methodology for determining future settlement boundaries is still yet to be defined, it is worth noting that the site at Ash Flats would make a logical extension to Stafford and should be included with the revised settlement boundary of Stafford Town.
- 3.131. Paragraph 5.97 of the Issues and Options Report sets out development which is to be excluded from any future settlement boundaries and none of these exclusions apply to the Ash Flats site, furthermore, demonstrating the suitability of the site for inclusion in the revised settlement boundary.

## 4. Delivering Housing (Questions 8A, 8B, 8C, 8D, 8E, 8F, 8H, 8I, 8K, 8N)

### **Question 8A – Should the Council continue to encourage the development of brownfield land over greenfield land?**

- 4.1. It is appreciated that there should be a focus on making effective use of land, which includes seeking to utilise existing brownfield sites to accommodate new development.
- 4.2. Paragraph 8.6 of the Issues and Paper sets out that the NPPF “states that planning policies should consider prioritising the use of brownfield land to meet the identified housing need of an area” and references paragraph 117 of the NPPF.
- 4.3. However, paragraph 117 of the NPPF only seeks to ensure that policies make as much as possible of brownfield land, stating:

*“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”.*

- 4.4. Therefore, whilst the use of brownfield land is encouraged, the NPPF does not prioritise the use of brownfield land above greenfield sites. To be found sound policies are to be consistent with national policy and a policy prioritising the use of brownfield land above greenfield sites would not meet this test.
- 4.5. Furthermore, in order to provide the estimated amount of land to accommodate the housing requirements of the Local Plan Part One, the Council promoted three SDLs, utilising land outside of the then existing settlement boundary of Stafford Town. This demonstrates that even back in 2014 there was a lack of brownfield to get anywhere near accommodating the required numbers of new housing. Progressing with such an approach would jeopardise the Borough’s growth aspirations and also be inconsistent with the NPPF as it would not be able to meet the Borough’s housing needs.
- 4.6. On this basis, there is objection to progressing with an approach which seeks to prioritise brownfield land over greenfield land.

### **Question 8B – 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?**

- 4.7. The Borough of Stafford is made up of a number of different settlements of varying sizes and scales and as set out in the Issues and Options Paper (paragraph 2.2) is predominantly rural in nature. On this basis we do not support the suggestion of a blanket density threshold that new residential schemes across the entire Borough would need to meet as it is unlikely that one single density target will be applicable in all areas of the Borough.
- 4.8. Instead densities should reflect site and scheme specific circumstances being appropriate to the character of the local surrounding area. Applying such an approach will enable the most effective use of land suitable for housing as required by the NPPF.
- 4.9. The Strategic Housing and Employment Land Availability Assessment (SHELAA) 2019 sets out density assumptions for different parts of the Borough. For sites on the edge of Stafford the assumed density is 35 dwellings per hectare (dph), however, it is important to note that

the SHELAA considers this to be a starting point for estimating site capacity. Therefore, if sustainable and deliverable sites come forward proposing higher densities this should not automatically be rejected. Each site should be considered based on its specific circumstances and where higher densities can be suitably accommodated this should be encouraged.

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

- 4.10. The availability and proximity of sustainable travel options from a site can assist in considering the suitable density of a development. However, it should not be the only measure and consideration.

**Question 8D – 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 the Stafford Borough?**

**Question 8E – 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.**

- 4.11. Imposing Nationally Described Space Standards will only work if there is a consistent approach for this being applied equally to all housing schemes across the country. There needs to be a clearer steer at the national level before local policies seek to impose any space standards.

**Question 8F – 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?**

- 4.12. It is important that a wide range and mix of dwelling size, type and tenures are available across the Borough. However, we would not support a policy requiring a specific mix of dwellings to be provided on each site coming forward.
- 4.13. The size, type and tenure of dwellings will be dictated by market conditions at the time, so there should be flexibility for schemes to come forward which reflect the current housing needs at that time.

**Question 8H – Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?**

- 4.14. Ensuring access for all is important in the design of new developments. However, Building Regulations set out specific accessibility standards which do not need to be repeated in planning policy.

**Question 8I**

**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?**

- 4.15. We do not support a mandatory policy requiring bungalows are delivered on all major developments. It is appreciated that a range and mix of housing should be provided to meet all different needs of the community. However, housing mix and type will largely be dictated by market and local needs.
- 4.16. Seddon Homes do provide bungalows as part of their housing schemes, but for this to be viable there has to be a local need for this specific type of dwelling in an area or there is a

risk these properties will remain vacant.

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

- 4.17. Bungalows should be provided with private amenity space. The size of which should be dictated by the size and needs of the likely occupants of the property.

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

- 4.18. N/A.

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

- 4.19. N/A.

**Question 8K**

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

- 4.20. The EDHNA (paragraph 9.90) notes that the supply of new affordable housing provided has varied in line with market factors in recent years. Affordable Housing completions peaked in 2016/17 when 343 affordable homes were completions, with the average affordable homes completion rate over the past six years being 193 dpa.
- 4.21. Based on a need of between 252 and 389 affordable homes per annum, the Issues and Options Paper acknowledges that even assuming 30% of overall housing delivered was affordable, it is unlikely that the full affordable locally assessed need could be achieved (paragraph 5.10).
- 4.22. The EDHNA also notes that if the housing target of 711dpa (regeneration scenario and PCU) this would still not address the current identified need if the affordable housing was 30%. The lower end of affordable housing need could only be addressed if policy requirements were increased to 36% (paragraph 11.68).
- 4.23. It is important to note that there does need to be a balance between meeting affordable housing needs and ensuring schemes remain viable and indeed are able to come forward. Increasing the level of affordable housing required as part of new schemes is not the answer and could lead to a stagnation in sites coming forward. Instead, increasing the housing requirement and identifying a wide range of deliverable sites increasing the prospects of more affordable housing being delivered.
- 4.24. The NPPF sets out at paragraph 65 that *“strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period”*.
- 4.25. This is reiterated in the NPPG which suggests an increase in total housing figures included in a plan may need to be considered where it could help deliver the required number of affordable homes.
- 4.26. Therefore, in order for the Borough to have the best chances of delivering the required affordable housing needs it has to focus on a high growth strategy. This is also acknowledged in the Issues and Options Paper which states, *“nevertheless, via an uplift in the total housing numbers for the Borough, it would be possible to assist in the delivery of the required affordable housing”* (paragraph 5.10). Demonstrating the need for a high growth strategy which identifies a range of sites to progressed through the new Local Plan.

**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?**

- 4.27. The Council should, seek to meet the identified affordable housing needs but balance this against scheme viability to ensure sites are able to come forward. Placing onerous requirements upon schemes risks the overall level of housing demand not being met if schemes end up becoming unviable.
- 4.28. As set out above, progressing with a high and aspirational growth strategy provides the best prospects for meeting the identified affordable housing needs.

**Question 8L – Should the Council require affordable units to be delivered on sites with a capacity of less than 5 units in designated rural areas?**

- 4.29. N/A.

**Question 8M – 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?**

- 4.30. N/A.

**Question 8N**

**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?**

- 4.31. The Issues and Options Paper (paragraph 8.34) states that at present there are 42 individuals whom have expressed an interest in building a self-build home. This is a relatively low figure and whilst the interests of these 42 individuals should be accommodated, the current level of demand does not warrant 5% of plots on schemes over 100 dwellings to be self / custom build plots.
- 4.32. There is no explanation provided as to why a threshold of 100 dwellings or indeed a suggested provision of 5% has been suggested. Policies will need to be based on robust evidence justifying any targets/requirements. At this stage the suggestions in question 8N are not underpinned by any evidence, therefore, if progressed on this basis would not be found sound.
- 4.33. On that basis, there is objection to carrying forward the suggestion approach in question 8N.

## 5. Delivering Quality Development (Questions 9E, 9F, 9J, 9N)

**Question 9E – 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 future measures which you think should be adopted to further enhance these efforts?**

- 5.1. There is no mention in the suggested approach of considering the quality of the trees. Any new policy should not seek to protect existing trees at all costs, for example where existing trees have become diseased or are of a very low quality.
- 5.2. Furthermore, if trees are to be lost in one part of the Borough, there shouldn’t then be a requirement for new development proposals to provide additional tree planting to take account of this loss, given the two are not related.

**Question 9F – 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.**

- 5.3. No. There should not be a mandatory requirement for all new developments to provide space for growing food. There is no evidence presented in the Issues and Options Paper which indicates that there is a shortage of allotment, community garden facilities across the Borough.
- 5.4. This should be the starting point to first see what the existing level of provision, and indeed quality, is and then to consider whether there is a waiting list/demand for such facilities.
- 5.5. There is already a number of open space requirements that will be associated with the provision of new developments and these need to be managed to ensure the actual provision meets the needs of the local community and also that scheme viability is not affected.

**Question 9J – Do you consider that the current “Design” SPD provides sufficient guidance for design issues in the Borough? Please explain your rationale.**

- 5.6. The importance of delivering developments to a good/high design standard is set out in the NPPF and also the existing SPD. Whilst the SPD is not a statutory part of the development plan it still carries weight in the decision making process as a material planning consideration. Also, the provisions of the NPPF will have to be taken into account when designing new development schemes.
- 5.7. On this basis, there is no pressing need for a separate policy in the new Local Plan seeking to ensure that new developments achieve a good level of design standard. However, should the Council decide to include new policies relating to design, these should not impose onerous requirements and be flexibility in terms of when and how good design principles are applied and demonstrated.

**Question 9N**

**A) Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so, where?**

- 5.8. N/A

**B) Are there any other Borough-wide facilities you feel should be associated with**

open space?

5.9. N/A

**C) Are there any settlements that you believe are lacking in any open space provision?**

5.10. N/A

**D) Should the Council seek to apply Play England standards to new housing developments?**

**E) Should the Council seek to apply Fields in Trust standard to providing sports and children's facilities?**

**F) Should the Council seek to apply Natural England's ANGSt to new development?**

**G) Should the Council seek to develop a bespoke standard in relation to open and / or play space?**

5.11. In response to question 9N (D) – (G), which ever methodology is selected needs to be robustly justified. Evidence needs to be presented as to why the preferred approach is deemed the most appropriate.

5.12. Furthermore, any standards should only be used as a starting point, with sites / development proposals being considered on a site by site basis.

**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)?**

5.13. Whilst encouraging an active lifestyle should be factored into the development of new schemes, it should not necessarily be the case that provision of active lifestyle features be a mandatory requirement. There may be instances where it would be more beneficial to improve existing local facilities close by. Therefore, any future policies will need to be sufficiently flexible to allow on-site or off-site provision or a financial contribution to be provided to meet the requirements of encouraging an active lifestyle.

5.14. In terms of the suggested threshold of 100 dwellings, there is no evidence provided as to why and how this size of development has been selected. This information should be made available for review and comment, so it is clear what methodology the Council is using for the basis of public open space/sport and recreation policies.

**I) Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure?**

5.15. Improving connectivity through additional linkages to the cycling and walking network should be considered as part of new development proposals. However, it is not always possible to provide direct connections from new development sites to wider cycling infrastructure, for example the site might be located in area with only limited existing infrastructure. New schemes can only seek to facilitate such connections. Therefore, it should not be a mandatory requirement that new development schemes must connect to both existing cycling and walking infrastructure.

**J) Should the Council require all high-density schemes to provide communal garden space?**

5.16. Not necessarily. Just because a scheme is high-density does not mean that it automatically warrants provision of communal garden space. A high-density scheme can still have the

ability to provide private garden space and make the necessary provisions in terms of public open space/sport and recreational facilities even if this is through a financial contribution.

## 6. Environmental Quality (Questions 10A and 10C)

**Question 10A – 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?**

- 6.1. It is important that any such policy requirement is sufficiently flexible and only requires the infrastructure to facilitate electric vehicle charging points to be provided. Due to the number of different point/connections available it would currently be abortive work and cost to install the full charging point as future residents might require a different type of connection point.
- 6.2. However, by just providing the infrastructure, this enables the end user to install the correct connection point they require at that time.

**B) Ensure all major development is accessible by regular public transport?**

- 6.3. Having access to public transport is an important aspect of delivering sustainable development, however, it is only one measure.
- 6.4. Whilst consideration can be given to proximity of public transport, it is also important to take account of proximity of local services and facilities that can be accessed on foot / bike. Just because a site is not served by a regular bus service does not mean that future residents can't easily access local facilities without being reliant on the private car.
- 6.5. Furthermore, the delivery of new development can in fact assist with improving local public transport provision. Therefore, just because a site is not initially served by a regular public transport services doesn't mean it should be discounted as a suitable site to come forward for development.
- 6.6. A policy requiring all major development to be accessible by regular public transport is too simplistic and assumes this is the only measure of accessibility.

**C) Enforce Air Quality Management Zones around areas of notable biodiversity importance?**

- 6.7. There shouldn't be an automatic designation of Air Quality Management Zones around areas of notable biodiversity importance. Each important biodiversity feature and the impact from local air quality will need to be assessed on an individual basis. Only where there is evidence to support the designation of an Air Quality Management Zone should this be done.

**D) Employ any further methods which you consider will aid in the improvement of air quality within the Borough?**

- 6.8. N/A

**Question 10B – The currently adopted Plan for Stafford Borough does not enforce any policy to mitigate for the impacts of NO<sub>2</sub> particles on internationally designated sites. Therefore, should the Council enforce a scheme whereby any development likely to result in an increase of NO<sub>2</sub> deposition on these sites in Stafford Borough must**

**contribute to a mitigation programme?**

- 6.9. Each scheme/application should be assessed on its own merits. For example, it might be the case that an increase in NO<sub>2</sub> deposits can be mitigated in other ways as oppose to having to provide a financial contribution to a mitigation programme.
- 6.10. There shouldn't be a policy which automatically requires such schemes to provide a contribution towards a mitigation programme. It is important that there is flexibility as to how the impacts of a development are mitigated to ensure that the most appropriate strategy for that particular case can be applied.

**Question 10C – 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 sites?**

- 6.11. Whilst it is important that there is a clear understanding as to how waste generated by new development proposals will be managed, it is not always possible to provide this information up front as part of a planning application submission. Therefore, there should be flexibility for such requirements to be secured via a suitably worded condition.
- 6.12. Any condition should allow development works to commence and request details of waste management to be provided prior to properties being occupied.

**B) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?**

- 6.13. Details of the management of waste during the construction phase is typically set out in a Construction Environmental Management Plan (CEMP). Requiring submission of a CEMP can be secured via a suitably worded condition on any planning permission.
- 6.14. Therefore, any future policy requiring submission of a CEMP, where necessary and appropriate, should ensure there is flexibility for this to be provided post-decision.

**C) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford Borough?**

- 6.15. N/A

## 7. Health and Wellbeing (Questions 11A and 11B)

**Question 11A – (A) Should the New Local Plan 2020-2040 continue to address health and wellbeing via relevant associated policies in the way the current adopted plan does? (B) or should an alternative approach to the integration of health and wellbeing issues into the New Local Plan be adopted? (C) where should references to health and wellbeing be strengthened in the New Stafford Borough Local Plan?**

- 7.1. If the Council will be seeking to impose requirements relating to health and wellbeing on new developments, it would be helpful to developers for there to be some guidance on this and for any requirements to be clearly set out. Having adopted policies which cover these points would assist in giving clarity as to what would be expected.
- 7.2. Similarly to the comments raised in relation to other questions, it will be important to ensure that the requirements placed on new developments are not onerous and that there is sufficient flexibility incorporated as to how measures are ultimately delivered.

**Question 11B – If at question A you considered that the Council should adopt an alternative approach to the integration of health and wellbeing issues into the New Local Plan which potential model would you advocate? (See Para 11.10: Models A; B; C) What is the reasoning for this answer? Do you consider that there is an alternative approach to this issue that might be considered? If so, please describe/give an example.**

- 7.3. The requirement for any Health Impact Assessments should be justified and there should be flexibility for the scope of any such assessment to reflect the size/scale/nature of the development proposal.

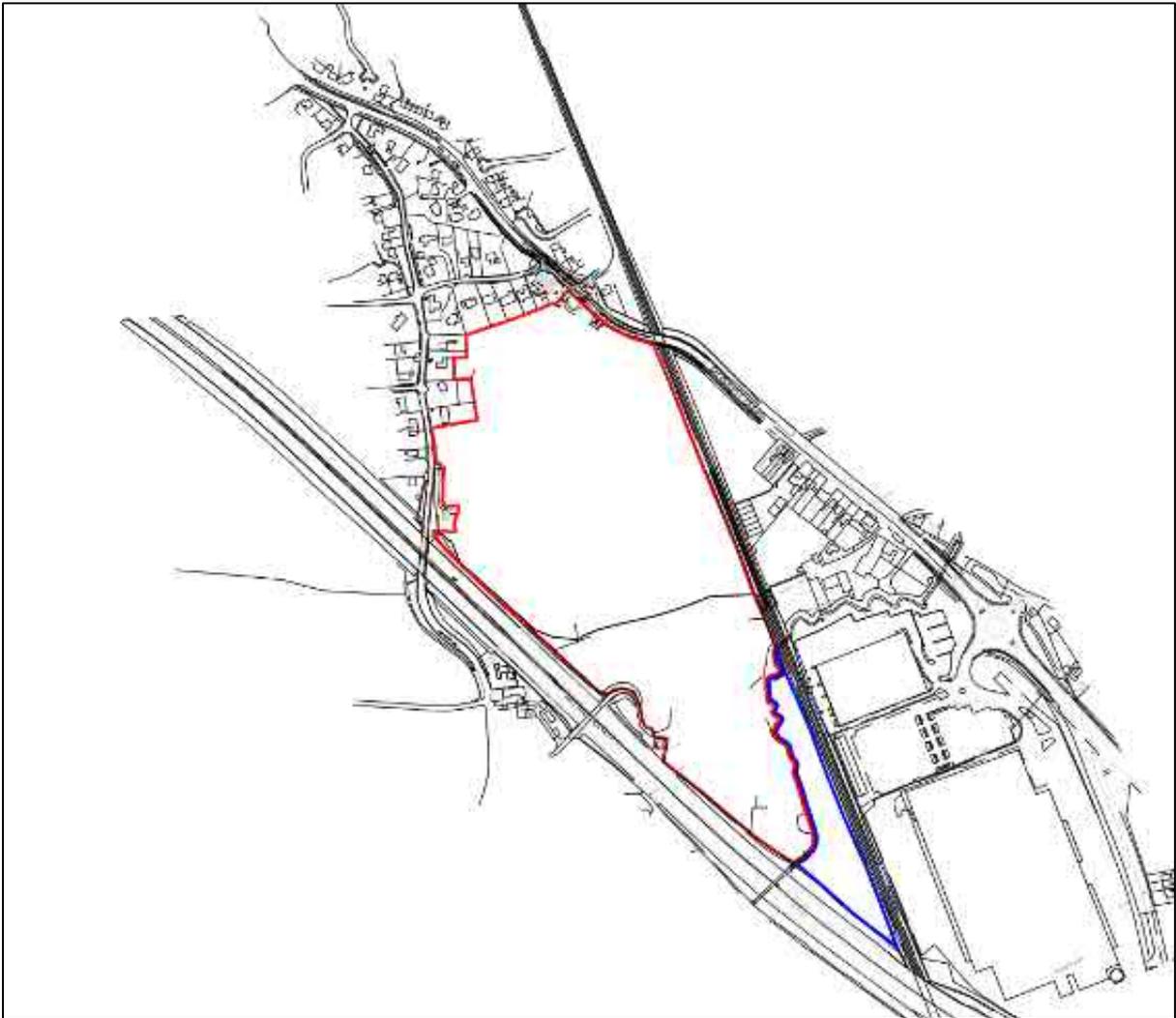
## 8. Connections (Question 12D)

**Question 12D – Do you consider it is necessary to set local parking standards for residential and non-residential development? If so, should a similar approach of minimum standards to 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.**

- 8.1. Due to the varied nature of the different settlements across Stafford, as set out at paragraph 12.10 of the Issues and Options Paper, it will be difficult to set parking standards which reflect all circumstances. As a result, parking standards, particularly for residential uses, should be considered on a site by site basis. This will enable matters such as proximity of public transport facilities and local services / facilities to be taken into account.

# Appendix 1

## Land at Ash Flats, Stafford – Site Location Plan



(Site refers to the red line boundary)



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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>	<b>Messrs</b>	<b>Mrs</b>
<b>First Name</b>		<b>Janet</b>
<b>Surname</b>	<b>Nickolls</b>	<b>Hodson</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Principal</b>
<b>Organisation (if applicable)</b>		<b>JVH Town Planning Consultants Ltd</b>
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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- 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.

<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b>		<b>Organisation</b>			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	<b>5D,5H, 8A</b>	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>Question 5.D</b></p> <p><b>i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?</b></p> <p><b>ii. Do you agree that the smaller settlements should be included in the Settlement Hierarchy?</b></p> <p>It is considered that the new housing growth should be dispersed to have more growth in the small villages, where sites are available to support the organic development of Settlements and to keep the facilities in those settlements viable. Development is supported in Milford on the site of the transport depot where it is considered a development of around 10 dwellings can be provided. This is a brownfield site of 0.59 hectares that can be brought forward in the short term making provision for new homes in an attractive location. It is noted that Milford is not included in the settlement hierarchy as a small village, and it is considered that it should be so included. The settlement study indicated that it is a settlement of 103 dwellings and is therefore of a commensurate scale with the villages in that level of the hierarchy. The study also noted that the settlement had a school, food and drink establishments, an hourly bus service and was in close proximity to employment; it is furthermore close to Stafford and is clearly a sustainable location.</p>					

**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.**

The dispersed approach to housing distribution Option 3 is therefore supported, this allows for more development in the small settlements where there are suitable sites. The Plan should aim to have at least 10% of the growth to this level of settlement over the Plan Period.

Previous plans have placed the emphasis for development on the major centres, where sites are slow to come forward, the changing emphasis in the NPPF to support rural settlements and to include smaller sites as part of the land portfolio allow a for a wider distribution of growth, on sites where it has been shown that delivery of homes is speedier.

Furthermore the provision of smaller sites over a wider geographical area allows for small and medium sized housebuilders to acquire land and deliver homes. Something which does not happen on larger sites. This gives rise to a greater diversity of homes, and often bespoke homes for specific requirements.

The inclusion of new settlements/ garden communities into the proposals is not welcomed.

These types of projects have long lead in times and are often not capable of delivery.

**Question 8.A**

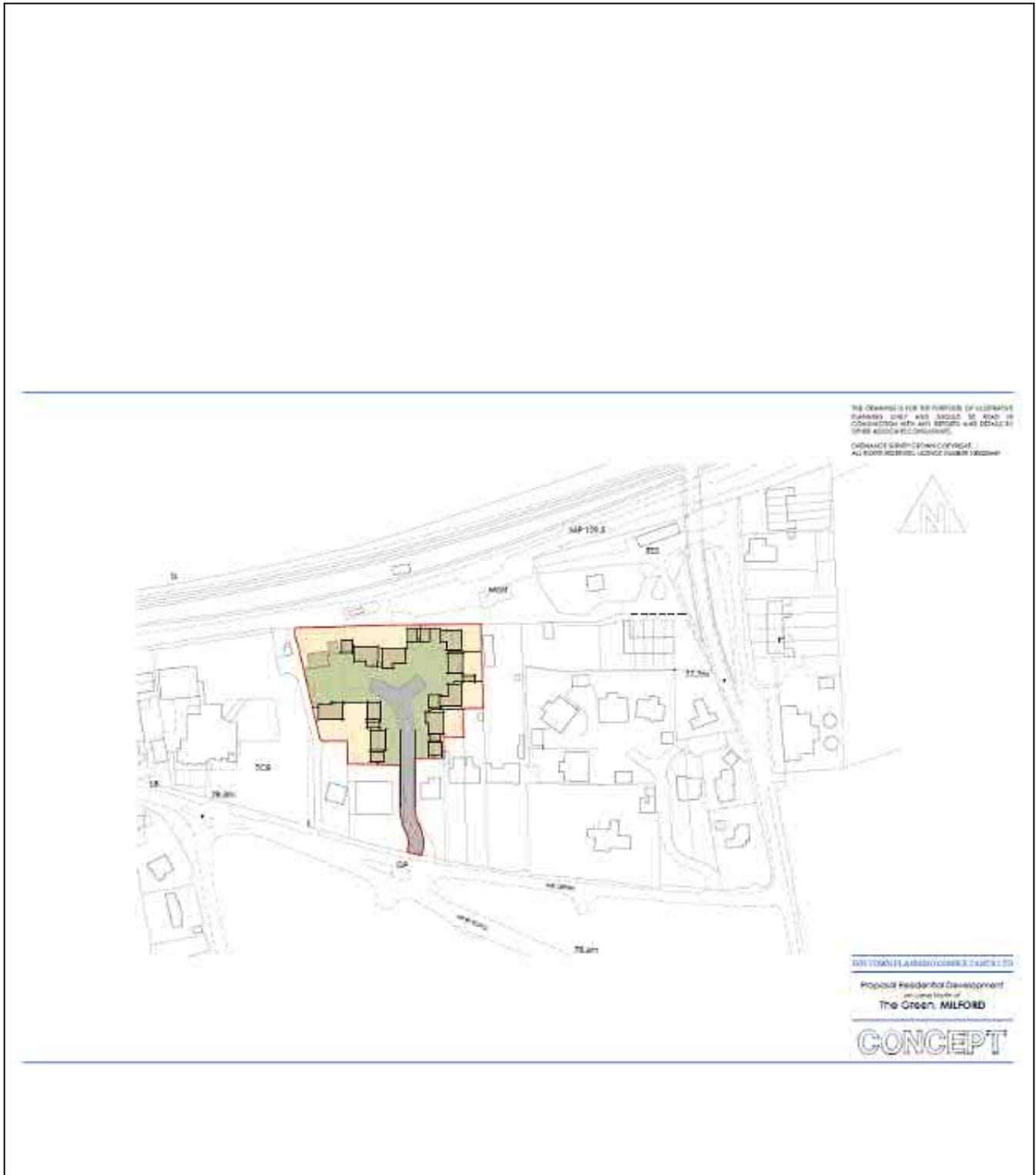
**Should the council continue to encourage the development of brownfield land over greenfield land?**

Brownfield land has had a previous use and avoids using greenfield sites. The site at Milford for example has a transport depot consent and is currently still in that use.

The re use of such sites for housing enables the land to be brought into a positive use and has the effect of preventing the re use of the site for potential unsuitable commercial purposes in an effort to achieve a reasonable land value and return on investment. The Council should take a positive view towards such sites and where they are in rural locations consider the potential reuses and the benefits that could accrue from a residential re use over a commercial one in terms of traffic generation, pollution, environmental impact and community positivity.

Site at Milford 0.59 Hectares.





*Please use a continuation sheet if necessary*

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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**

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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](http://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](mailto:forwardplanningconsultations@staffordbc.gov.uk)

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<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>	<b>Mr</b>	<b>Mrs</b>
<b>First Name</b>	<b>A</b>	<b>Janet</b>
<b>Surname</b>	<b>Tavernor</b>	<b>Hodson</b>
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		<b>Principal</b>
<b>Organisation (if applicable)</b>		<b>JVH Town Planning Consultants Ltd</b>
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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<b>Part B: Your Comments</b>					
<i>Please complete a new Part B for each representation you wish to make.</i>					
<b>Name</b>		<b>Organisation</b>			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>	<b>6.B, 6.C, 6.F, 6.H</b>	<b>Table</b>	
<b>Figure</b>		<b>Question</b>		<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p><b>Question 6.B To ensure optimal economic prosperity, do you consider that the Council should:</b>  <b>a) Allocate employment land so that it extends existing employment premises / areas in the Borough? b) Allocate employment in both urban and rural areas?</b></p> <p>The Council should ensure through the new Local Plan that existing employment sites can expand. It is important that sites within the rural areas can expand their operation and provide more jobs to ensure that the rural economy is sustained.</p> <p>The site at Weston shown below amounting to 3.8 hectares should be specifically allocated as a small site suitable either for an expansion of the existing operation or for new business. The site is already accessed, serviced and landscaped to a high standard.</p> <p><b>Question 6.C Which specific locations (if any) do you think would benefit from the increased provision of employment premises? If so, for what type of activity?</b></p> <p>The rural areas will benefit from increased provision of sites capable of occupation by uses that have specific locational and site requirements. Sites for businesses such as these are not always available on industrial estates.</p>					

**Question 6.F a) Where do you consider small and medium size units should be made available? 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? Please explain the rationale for your answer.**

Small and medium sized units should be available in the rural areas in reasonable proximity to settlements and with good access onto the main roads

**Question 6.H To assist the rural economy should the Council: a) Allocate 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?**

Land should be allocated as shown below to allow the extension of existing business and allow for new uses to be located that also have specific development needs.

**Site at Weston – 3.8 hectares**



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	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>	Mr	Mr
<b>First Name</b>	B	Ben
<b>Surname</b>	Ivanovic	Weatherley
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		Partner
<b>Organisation (if applicable)</b>	Ivanovic and Company Limited	Knights plc
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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<b>Part B: Your Comments</b>				
<i>Please complete a new Part B for each representation you wish to make.</i>				
<b>Name</b> Knights plc		<b>Organisation</b> Ivanovic and Company Limited		
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	5.B	<b>Other</b>
<b>2. Please set out your comments below</b>				
<b>5.B(a) Housing requirement</b>				
<p>The housing requirement figure for Stafford Borough should be based on actual / objectively assessed needs, taking into account actual need for affordable housing, older persons housing need and actual household formation rates. The Council should not rely on figures established through the Standard Method because the figures used to establish Local Housing Need under the Standard Method rely on past trends. Such past trends rely on suppressed household formation rates which the Standard Method extrapolates into the future. This means real households in actual need will not get the homes that are needed. It is understood that the Government are reviewing the Standard Methodology, so using the figure established under the Standard Method should in our view be taken with a huge degree of caution.</p> <p>Further to the above, national policy requires authorities to significantly boost the supply of housing. The Standard Method figure of 408 dwellings per annum is 20% lower than the adopted housing requirement figure of 500 dwellings per annum established in the extant Local Plan. Therefore, the Standard Method figure would not “significantly boost” the supply of housing as required by the Framework.</p>				
<b>5.B(b) Partial catch up rate</b>				
<p>With regard to using a partial catch up rate, this aspect of establishing the housing requirement is supported. The housing requirement established using the Standard Method in effect “wipes the slate clean” so any unmet need from previous years does not get adequately projected into the future, and this would particularly be the case in Stafford Borough because the Standard Method figure is substantially lower than the adopted housing requirement figure.</p> <p>By way of illustration, the Council’s affordable housing need is identified as being in the region of 252 - 389 affordable homes per annum. The Standard Methodology uplift of 21% (Table 5.1 of the consultation document) suggests that the affordability uplift would add in the region of 57-70 dwellings per annum to the annual housing requirement figure established using the Standard Method which highlights its main flaw in that it does not</p>				

reflect actual need. It is therefore clear that the Standard Method figure should not be used as the basis of the new Local Plan.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.C	<b>Other</b>	

**2. Please set out your comments below**

It is our position that there should not be a discount for the 6,000 units currently provided for to date. The only numbers that should be taken into account are existing commitments that should be rolled forward and taken into account in the figures for the early part of the plan period.

The status of any current allocations that have yet to deliver housing should be reviewed to establish whether or not they are still likely to deliver housing over the course of the new plan period. In addition, all sites that are put forward should be assessed against the new definition of deliverable contained in the current version of the Framework for the purposes of establishing whether or not the plan will deliver a 5 year supply of deliverable housing sites upon adoption.

Critically, this should be based upon a realistic assessment of lead in times and build out rates based upon locally available evidence. A useful starting point is the “Start to Finish (second edition)” document by Lichfields ( <https://lichfields.uk/content/insights/start-to-finish>).

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.D	<b>Other</b>	

**2. Please set out your comments below**

We agree with the basis for the preparation of the 2019 Settlement Hierarchy.

We also agree that the smaller settlements should be included in the Settlement Hierarchy in the new Local Plan.

We specifically support the inclusion of Aston-by-Stone in the Small Settlements settlement category.

The centre of Aston-by-Stone is just a short distance (circa 0.7 km) from the closest urban edge/area of Stone to the north, which comprises the south east edge of Stone Business Park that was recently extended by way of the creation of a car storage and distribution depot for Jaguar Land Rover. To the south of Aston-by-Stone, Stone Hockey and Rugby Club is approximately 0.3km away and Yarlet School approximately 1.5km away.

Given the proximity of the A34 and existing bus stops, Aston-by-Stone also benefits from excellent pedestrian and cycle connections to Stone and public transport connections to Stone, Stafford and elsewhere. The bus stops on both sides of Stone Road close to its junction with Aston Lane provide a regular service (no. 101) between Hanley - Newcastle - Stone - Stafford.

As the Issues and Options consultation document itself recognises (paragraph 5.22), the revised NPPF supports sustainable rural development and in its section on rural housing emphasises the need for planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services (paragraph 78). Therefore we agree that the proportionate growth of smaller settlements such as Aston-by-Stone would accord with National Policy and support its inclusion in the proposed Settlement Hierarchy and the identification of small sites in the village for housing development in the plan period.

The NPPF also states that the development of isolated homes in the countryside should be avoided unless one or more of a series of circumstances apply (paragraph 79). As set out above Aston-by-Stone is in an accessible location close to the existing urban edge of Stone. Indeed we consider the village to be in a highly sustainable location relative to settlements of its size.

In our view the village of Aston-by-Stone is clearly not an isolated location, particularly given the amount of housing development and other services in the village, its proximity to the urban edge of Stone - including employment opportunities at Stone Business Park nearby and the wide range of local services available in the town - and that it is accessible to Stone not only by car but also by alternative methods of transport including public transport, by bicycle and on foot and has good road and public transport connections to higher order settlements including Stafford, Newcastle-under-Lyme and Hanley City Centre.

Furthermore the proportionate growth of smaller settlements such as Aston-by-Stone would reduce the pressure on Stafford, Stone and the largest villages in the Borough (and any Garden Community(s) / Major Urban Extension(s) that feature in the new Local Plan) to achieve the Borough's development requirements over the coming years.

With these factors and the clear opportunities (including those identified in the SHELAA) for the village to accommodate proportionate growth, we strongly support the inclusion of Aston-by-Stone in the proposed Settlement Hierarchy

One of the aforementioned sites identified in the SHELAA (Site ID SRUR12) comprises two parcels of land in our client's ownership to the south east of Aston Lane in Aston-by-Stone, with a combined area of circa 3 hectares. The smaller northern parcel fronts

Aston Lane on its north west boundary and a track (public right of way - 'Stone Rural 23') on its north east boundary. The larger southern parcel has a frontage to Aston Lane at its northern end and includes additional land to the south that is situated to the rear of dwellings fronting Aston Lane and a private road off Aston Lane, with the southern end of this parcel featuring land positioned in between a dwelling fronting that private road off Aston Lane and dwellings that back onto Stone Road (A34).

As set out in more detail in our Call for Sites representation submitted in September 2019, we assert that housing development within this site would comprise a proportionate scale of housing growth of the village and amount to a logical form of development, with a mix of infilling and sensible rounding off of the village. Furthermore we do not consider that the site has any constraints that would prevent its development.

The characteristics of the site are such that we consider it has potential to accommodate (at the very least) infill development within its two sections that front Aston Lane (comprising gaps between existing built development fronting Aston Lane) and perhaps also in the space between the dwellings known as Gypsy Green and Aston Hill Cottage at the southern end of the site. There may also be potential for some additional development to the rear of such infill opportunities, given that there are examples of existing built development protruding beyond/behind the line of development fronting Aston Lane on this side of the road (including Aston Hall Barn in between the two parcels of land and Selworthy House adjacent to the southern end of the site).

The site could potentially accommodate a variety of types and tenures of housing, subject to the extent of the site that may come forward for development. This includes the potential for self-build plots that may contribute to and complement the existing variety of house types/styles in the village. Given its frontages to Aston Lane, we anticipate that satisfactory access to the site could be achieved to serve its development.

The site's constraints include that there are trees and other vegetation on the site perimeter and in places within the site. However we do not anticipate that the vegetation within the site would prevent development taking place, rather that it is potentially a key merit of the site in terms of providing soft and attractive boundaries to its future development and that - subject to more detailed assessment if/when preparing a development proposal in future (e.g. at planning application stage) - a landscaping scheme could be prepared to ensure the provision of appropriate replacement planting where required and a high quality landscape setting to the development overall.

It is also noted that there is a listed building close by, but it is not considered that this would prevent development taking place. It is acknowledged that care would need to be taken to ensure that any future development within the site is well designed to respect and ensure an acceptable impact on the setting of this listed building.

Accordingly the SHELAA site assessment recognises that the site is both available and achievable, and only concludes it is not suitable on the basis that a review of the Sustainable Settlement Hierarchy is required to remove the current constraint of the site/village not being within or adjacent to a currently recognised Local Plan settlement (which would be addressed by the proposed inclusion of Aston-by-Stone in the Settlement Hierarchy). It also confirms the potential yield of the site of up to 63 dwellings.

The NPPF also stresses the important contribution that small and medium sized sites can make to meet the housing requirement of an area, that they are often built out relatively quickly and that LPAs should give great weight to the benefits of using suitable sites within existing settlements for homes. Housing developments of the scale and nature that could be accommodated within our client's site could therefore make an important contribution towards delivering the Borough's development requirements during the plan period of the new Local Plan.

We therefore support the proposed inclusion of Aston-by-Stone in the Settlement Hierarchy and respectfully request that the LPA gives due consideration to the potential to identify the two parcels of land within our client's site as a small site for housing development of a scale that would enable proportionate growth of Aston-by-Stone.

**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**

The consultation document puts forward a range of potential spatial scenarios, summarised as follows:

1. Intensification of town and district centres
2. Garden communities
3. Dispersal of development
4. Intensification around the edges of larger settlements and strategic extensions
5. String settlement clusters
6. Wheel cluster settlements focussed on Stafford and surrounding settlements

In terms of which scenarios should be avoided, a sole strategy of intensifying existing town and district centres should be avoided because this strategy alone is unlikely to be compliant with the NPPF in terms of allowing the Council to meet all of its identified development needs, and likewise, it is unlikely to enable the delivery of sustainable development in rural areas through restricting development there.

None of the strategies suggested should be pursued on their own, and it is considered that a combination of dispersing development, intensifying the edges of larger settlements / strategic extensions, the provision of one or more garden communities and the "wheel cluster" around Stafford approach would be the most suitable option.

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	5.G	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>Yes we consider a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying the Borough’s future development requirements.</p> <p>However whichever approach the Local Plan takes in this respect, we consider that it should make provision for Small Settlements in the proposed Settlement Hierarchy to accommodate an amount/proportion of the Borough’s development requirements in any event, given the thrust of national policy (as considered in more detail in our response to Question 5.D).</p> <p>Therefore we consider that even in the event a new Garden Community / Major Urban Extension is to be provided there is a need for small settlements to accommodate some organic development/growth including housing development at suitable, available and deliverable locations. As set out in our representations in response to other questions our client’s land at Aston-by-Stone comprises an excellent opportunity to enable the settlement to grow in a logical, sensible and sustainable manner.</p>				

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	5.H	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>The consultation paper puts forward a range of potential strategies and rightly acknowledges that smaller / piecemeal expansion and infilling can often provide significant numbers of dwellings but without necessarily delivering appropriate amounts of physical and social infrastructure. Therefore the appropriate strategy needs to find the right balance between providing housing and employment where it is needed, but with appropriate infrastructure in place to support new and existing communities.</p> <p>In this case, Growth Option 5, which seeks to disperse development across the new settlement hierarchy with a new Garden Community / settlement, combining options that include the “Intensification of Town and District Centres”; “Intensification of edges of larger settlements and strategic extensions”; “Garden Communities”; and “Dispersal of development” is considered to be the most appropriate in terms of striking the right balance between meeting the needs of existing communities whilst not placing an undue burden on existing services and infrastructure, whilst creating new significantly larger communities with appropriate new services and infrastructure to meet their needs.</p>				

It is considered that the creation of garden communities of more than 2,500 dwellings or more would enable services and infrastructure to be properly planned for the area and in addition, the intensification and expansion of existing settlements would, in the short term, enable the Council to maintain a 5 year housing land supply at the early stage of the new local plan period with the larger developments and garden communities coming forward later in the plan period to enable to the Council to maintain a 5 year housing land supply later in the plan period. This option is considered to be the best opportunity to ensure that the “plan-led” system is maintained throughout the plan period by ensuring a continuous supply of deliverable housing sites throughout.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.J	<b>Other</b>	

**2. Please set out your comments below**

It is considered that growth options E and F with a partial catch up, no discounting and the provision of a garden community would be the most appropriate strategy for Stafford Borough to put forward as part of the emerging plan.

Pursuing the Local Housing Need figure established using the standard methodology would not significantly boost the delivery of housing as required by the Framework, nor would it meet the substantial need for affordable housing or adequately take into account the need for specific groups, such as older persons housing. Economic scenario F of 683 (746) dwellings per annum would better align towards meeting open market and affordable housing needs and the needs of specific groups whilst also taking into account the economic growth strategy for the functional economic area.

As already discussed, discounting the housing requirement using the basis of the current Local Plan is not supported because the only numbers that should be taken into account are existing commitments that should be rolled forward and taken into account in the figures for the early part of the plan period.

The status of any current allocations that have yet to deliver housing should be reviewed to establish whether or not they are still likely to deliver housing over the course of the new plan period. In addition, all sites that are put forward should be assessed against the new definition of deliverable contained in the current version of the Framework for the purposes of establishing whether or not the plan will deliver a 5 year supply of deliverable housing sites upon adoption. Critically, this should be based upon a realistic assessment of lead in times and build out rates based upon locally available evidence.

Given the high level of housing and economic need in the area, it is considered that spatial option 5 and 6 would be the most appropriate strategy to pursue because it is best placed to deliver sustainable development over the plan period by meeting current and future needs without placing undue pressure on existing settlements as well as taking into account any environmental constraints surrounding some of the existing settlements.

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	5.Q	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>Yes we agree with the methodology used to define settlement boundaries.</p> <p>Furthermore with regard to Development Principle 1 (including the commentary within paragraph 5.95) and Development Principle 2 (including the commentary within paragraph 5.97) we consider that our client’s site in Aston-by-Stone (SHELAA Site ID SRUR12) comprises open areas of land on the edge of the settlement that are appropriate for general (and specifically housing) development and amount to small scale development opportunities which would provide both infill and rounding off opportunities (as considered in more detail in our response to Question 5.D and within our September 2019 Call for Sites submission).</p> <p>Furthermore the SHELAA site assessment recognises the potential suitability and the availability of the site and its ability to accommodate up to 63 dwellings, subject to Aston-by-Stone being a recognised Local Plan settlement (which the proposed Settlement Hierarchy would address/enable).</p> <p>With all these points in mind we assert that our client’s land at Aston-by-Stone comprises an entirely suitable and logical development site that - taking into account and in accordance with the proposed methodology to define settlement boundaries - should be included within the settlement boundary of Aston-by-Stone in the new Local Plan.</p>				

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	8.A	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>With regard to the development of previously developed land, the Framework does not prioritise the development of brownfield land over greenfield land, but rather, it requires strategic policies to set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed land (Framework paragraph 117).</p> <p>The key for the Local Plan is to ensure that objectively assessed needs can be met and that a 5 year housing land supply can be maintained throughout the plan period. This can be maintained through the release of both previously developed land and greenfield land. In particular, a “brownfield first” policy should be avoided, as in some cases, previously developed land can be slower to come forward for development than greenfield land, and this therefore has implications for maintaining a 5 year housing land supply to an extent</p>				

such that additional development on unallocated greenfield sites comes forward because it will be necessary to engage the “tilted balance” of paragraph 11d of the Framework, hence additional greenfield development ends up being an unintended consequence of any “brownfield first” policy.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	8.B	<b>Other</b>	

**2. Please set out your comments below**

With regard to density thresholds, this should be flexibly applied relevant to the prevailing character of the area as well as the need to accommodate any physical or social infrastructure. In particular, the emerging legislative requirement for biodiversity net gain is an important consideration as part of the overall density of development that might be accommodated on particular allocations, so a blanket density approach should be avoided.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	8.F	<b>Other</b>	

**2. Please set out your comments below**

With regard to housing mix, a housing mix range is presented as a possible policy approach to the type of housing that is delivered. It is considered that the “range” approach is more suitable to give flexibility to housing developers, as well as enable appropriate densities to be achieved on each site.

For example, it may not be appropriate to expect a larger allocation to deliver around 30% 1-bed units, because it would be an inefficient use of land. Sometimes, a range of house sizes can be a blunt tool in terms of setting out the appropriate housing mix. What is usually more appropriate is to set out policies on specific needs that should be addressed, in terms of the proportion of affordable housing, older persons housing, first time buyers housing, etc. that is required, rather than solely identifying a mix of house types as a policy requirement.

***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-](http://www.staffordbc.gov.uk/new-local-plan-)

Please e-mail your comments (Preferred) to: [forwardplanning@staffordbc.gov.uk](mailto: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](http://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](mailto:forwardplanningconsultations@staffordbc.gov.uk)

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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>	Mr	Mr
<b>First Name</b>	Jonathan	Ben
<b>Surname</b>	Lloyd (and others)	Weatherley
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		Partner
<b>Organisation (if applicable)</b>	Jonathan Lloyd Developments Limited (and other Landowners)	Knights plc
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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](mailto: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](http://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.

<b>Part B: Your Comments</b>					
<b><i>Please complete a new Part B for each representation you wish to make.</i></b>					
<b>Name</b> Knights plc		<b>Organisation</b> Jonathan Lloyd Developments Limited (and other Landowners)			
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.B	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<b>5.B(a) Housing requirement</b>					
<p>The housing requirement figure for Stafford Borough should be based on actual / objectively assessed needs, taking into account actual need for affordable housing, older persons housing need and actual household formation rates. The Council should not rely on figures established through the Standard Method because the figures used to establish Local Housing Need under the Standard Method rely on past trends. Such past trends rely on suppressed household formation rates which the Standard Method extrapolates into the future. This means real households in actual need will not get the homes that are needed. It is understood that the Government are reviewing the Standard Methodology, so using the figure established under the Standard Method should in our view be taken with a huge degree of caution.</p> <p>Further to the above, national policy requires authorities to significantly boost the supply of housing. The Standard Method figure of 408 dwellings per annum is 20% lower than the adopted housing requirement figure of 500 dwellings per annum established in the extant Local Plan. Therefore, the Standard Method figure would not “significantly boost” the supply of housing as required by the Framework.</p>					
<b>5.B(b) Partial catch up rate</b>					
<p>With regard to using a partial catch up rate, this aspect of establishing the housing requirement is supported. The housing requirement established using the Standard Method in effect “wipes the slate clean” so any unmet need from previous years does not get adequately projected into the future, and this would particularly be the case in Stafford Borough because the Standard Method figure is substantially lower than the adopted housing requirement figure.</p> <p>By way of illustration, the Council’s affordable housing need is identified as being in the region of 252 - 389 affordable homes per annum. The Standard Methodology uplift of 21% (Table 5.1 of the consultation document) suggests that the affordability uplift would add in the region of 57-70 dwellings per annum to the annual housing requirement figure established using the Standard Method which highlights its main flaw in that it does not</p>					

reflect actual need. It is therefore clear that the Standard Method figure should not be used as the basis of the new Local Plan.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.C	<b>Other</b>	

**2. Please set out your comments below**

It is our position that there should not be a discount for the 6,000 units currently provided for to date. The only numbers that should be taken into account are existing commitments that should be rolled forward and taken into account in the figures for the early part of the plan period.

The status of any current allocations that have yet to deliver housing should be reviewed to establish whether or not they are still likely to deliver housing over the course of the new plan period. In addition, all sites that are put forward should be assessed against the new definition of deliverable contained in the current version of the Framework for the purposes of establishing whether or not the plan will deliver a 5 year supply of deliverable housing sites upon adoption.

Critically, this should be based upon a realistic assessment of lead in times and build out rates based upon locally available evidence. A useful starting point is the “Start to Finish (second edition)” document by Lichfields ( <https://lichfields.uk/content/insights/start-to-finish>).

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.D	<b>Other</b>	

**2. Please set out your comments below**

We agree with the basis for the preparation of the 2019 Settlement Hierarchy.

We also agree that the smaller settlements should be included in the Settlement Hierarchy in the new Local Plan.

We specifically support the inclusion of Hixon in the Large Settlements category, taking account of:

- i. the size of this settlement, including the extent of housing and employment development and existing local services;
- ii. the location of the settlement in the southern area of the Borough and in reasonably close proximity to and accessible from the largest settlement of Stafford;

- iii. the highly accessible location of the village, with good accessibility to higher order settlements/other places of employment (not least Stafford as mentioned above), good public transport connections (with potential for these to be enhanced in association with further and potentially any large scale development) and excellent connections to the A road and in turn motorway network;
- iv. existing commitments that include expansion to the likes of the Hixon Airfield Recognised Industrial Estate (including within the current Local Plan RIE boundary); and
- v. the strong potential for Hixon to accommodate further sustainable development / growth in the new Local Plan period.

Furthermore in relation to point v) above and as set out in more detail in our responses to other relevant questions, plus within our previous representations on the new Local Plan and in association with the Call for Sites process, we consider that our client’s land at Hixon Airfield (SHELAA Site IDs HIX07 and HIX08) should be brought forward for both further employment development as an expansion to the existing RIE and as a Major Urban Extension that would both make an important contribution towards delivering the Borough’s development requirements during the plan period of the new Local Plan and in turn further enhance the range of services and sustainability of this important settlement in relatively close proximity to Stafford.

Furthermore enabling a good level of growth at Hixon would reduce the pressure on Stafford, Stone and the other largest villages in the Borough (and any other Garden Community(s) / Major Urban Extension(s) that feature in the new Local Plan) to achieve the Borough’s development requirements over the coming years.

With these factors and the clear opportunities (including those identified in the SHELAA) for Hixon to accommodate growth, we strongly support the inclusion of Hixon in the Large Settlements category of the proposed Settlement Hierarchy and respectfully request that the LPA gives due consideration to the potential to support the development of the two areas of our client’s land for development in the new Local Plan.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.F	<b>Other</b>	

**2. Please set out your comments below**

The consultation document puts forward a range of potential spatial scenarios, summarised as follows:

1. Intensification of town and district centres
2. Garden communities
3. Dispersal of development
4. Intensification around the edges of larger settlements and strategic extensions
5. String settlement clusters
6. Wheel cluster settlements focussed on Stafford and surrounding settlements

In terms of which scenarios should be avoided, a sole strategy of intensifying existing town and district centres should be avoided because this strategy alone is unlikely to be compliant with the NPPF in terms of allowing the Council to meet all of its identified development needs, and likewise, it is unlikely to enable the delivery of sustainable development in rural areas through restricting development there.

None of the strategies suggested should be pursued on their own, and it is considered that a combination of dispersing development, intensifying the edges of larger settlements / strategic extensions, the provision of one or more garden communities and the “wheel cluster” around Stafford approach would be the most suitable option.

The above approach would:

1. Avoid the need to encroach into the Green Belt in the north of the Borough;
2. Give the Council greater scope and flexibility to meet sustainable development needs in a range of locations;
3. Provide flexibility in terms of delivery by having a range of sites / allocations that are capable of delivery early in the plan period with larger extensions and Garden Communities coming forward later in the plan period to meet development needs at that time;
4. Be more likely to ensure a plan-led 5 year housing land supply throughout the plan period
5. Ensure that undue pressure on existing infrastructure is minimised;
6. Ensure that appropriate new physical and social infrastructure can be delivered in tandem with urban extensions and Garden Communities;
7. Focus development to the south of the Borough in and around the largest settlement of Stafford (the largest and most sustainable settlement) and surrounding settlements;
8. By focusing development to the south of the Borough around Stafford, would ensure that significant new development does not compete with or undermine the regeneration objectives for the North Staffordshire conurbation (Stoke-on-Trent), which will be an important consideration as part of the Council's Duty to Co-operate with surrounding authorities;
9. Ensure that development within, or in close proximity to environmentally sensitive areas could be avoided or if necessary, more successfully mitigated, which will be a key consideration as part of any strategic environmental assessment and sustainability appraisal, the first stage that is required being avoidance, rather than mitigation.

In particular, with regard to the above strategy, it is considered that a new Garden Community in close proximity to Stafford would fit in with the “Wheel Cluster Settlement” strategy, and in that regard, the suggested Major Urban Extension at Hixon Airfield would complement well with that strategy, so in particular, the Garden Community approach (Hixon) combined with the wheel cluster settlement is supported.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.G	<b>Other</b>	

**2. Please set out your comments below**

It is considered that potential Garden Villages towards the southern half of the Borough would be the most appropriate to allocate for development.

The reason for this is that the delivery of significantly large developments closer to the North Staffordshire Urban Area (Stoke-on-Trent) may impact upon the regeneration objectives of the conurbation because of their proximity and potential levels of commuting. For example, one of the potential sites at Meecebrook could accommodate around 11,000 dwellings over time which is a significant level of development and this is one of the closest suggested garden villages to Stoke-on-Trent. Whilst this site is not located in the Green Belt, such a large allocation would reduce the level of separation between Stafford and Stoke-on-Trent as well as remove any degree of separation between Yarnfield and Eccleshall and this may generate pressure in the future to designate new areas of Green Belt in the north of the Borough and to the south of the North Staffordshire Conurbation. It is therefore considered that Meecebrook should be discounted.

A better option to avoid some of the above concerns would be the designation of Hixon Airfield as a Garden Community. It is located to the east of Stafford and would be in closer proximity to the largest settlement of Stafford, reflecting the self-contained nature of the housing and economic area identified in the HEDNA. Likewise, as it is a smaller potential Garden Village, the level of infrastructure required, whilst being significant, would not be as excessive as that required by the site at Meecebrook, therefore its deliverability within the second half of the plan period would be more realistic.

The location of the Hixon Airfield site is ideal as the site is previously developed land and the site is otherwise sustainably located to surrounding services and towns. Additionally a Garden Community on this site would include its own provision of services which could include a primary school and a village centre containing shops, social, medical, religious and community services. There would also be easy access to the site as the residents would be able to use the already approved new access road, with the view that if this site were to be allocated, the road could be extended to join Bridge Lane.

This use of an airfield would not be the first of its type to development as the Woodford Aerodrome on the border of Stockport Borough Council and Cheshire East Council was recently granted permission for a large phased housing development. The Woodford Aerodrome site straddles the administrative boundary between Stockport Metropolitan Borough Council [SMBC] and Cheshire East Council [CEC], with the western part of the site being within SMBC’s jurisdiction and the eastern part of the site being within CEC. In recognition of this SMBC and CEC have worked in partnership with the landowners to prepare a Supplementary Planning Document [SPD] for the site.

Like Hixon Airfield, the site represented an opportunity to create a high quality sustainable development that is integrated with existing settlements, and it is considered that such a strategy could be successfully replicated here.

Existing and emerging industrial estates / developments abutting the site would provide employment opportunities in addition to further new employment development within the site itself. The site is well served by public rights of way into the open countryside and areas to the north, west and south. The site is generally flat and open, yet well contained (And screened) by a combination of landscaping, and adjoining development (including Hixon Airfield Industrial Estate and a railway). The site is otherwise largely located outside of areas of flood risk, save for part of the north west corner of the site, which could be left undeveloped.

Otherwise, the site is suitable, available and deliverable for a combination of employment, housing, community uses.

The Aecom study suggest that:

- In transport terms, Hixon is more suitable for development
- The site is well located to the strategic employment area
- The site has low landscape value
- The site is suitable for economic development

The study goes on to conclude that “there are few constraints beyond the gas pipeline and flooding to the north of the site. The site’s location relative to Hixon makes it a suitable urban extension that would have a close functional relationship with Stafford also. There could be merit in testing this option alongside growth at Weston. The critical mass could potentially justify a new railway station”. In addition, the study suggests that limited new infrastructure would be required to bring forward a garden community in this location.

Therefore, it is considered that this site would be the most appropriate to provide a new Garden Community in the Local Plan and should be allocated as such.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.H	<b>Other</b>	

**2. Please set out your comments below**

The consultation paper puts forward a range of potential strategies and rightly acknowledges that smaller / piecemeal expansion and infilling can often provide significant numbers of dwellings but without necessarily delivering appropriate amounts of physical and social infrastructure. Therefore the appropriate strategy needs to find the right balance between providing housing and employment where it is needed, but with appropriate infrastructure in place to support new and existing communities.

In this case, **Growth Option 5**, which seeks to disperse development across the new settlement hierarchy with a new Garden Community / settlement, combining options that include the “Intensification of Town and District Centres”; “Intensification of edges of larger settlements and strategic extensions”; “Garden Communities”; and “Dispersal of development” is considered to be the most appropriate in terms of striking the right balance between meeting the needs of existing communities whilst not placing an undue burden on existing services and infrastructure, whilst creating new significantly larger communities with appropriate new services and infrastructure to meet their needs.

It is considered that the creation of garden communities of more than 2,500 dwellings or more would enable services and infrastructure to be properly planned for the area and in addition, the intensification and expansion of existing settlements would, in the short term, enable the Council to maintain a 5 year housing land supply at the early stage of the new local plan period with the larger developments and garden communities coming forward later in the plan period to enable to the Council to maintain a 5 year housing land supply later in the plan period. This option is considered to be the best opportunity to ensure that the “plan-led” system is maintained throughout the plan period by ensuring a continuous supply of deliverable housing sites throughout.

The provision of one or more garden communities in the second half of the plan period will also remove the pressure on infrastructure on the existing settlements of Stafford and Stone which are still the main focus for development as part of other development options. In particular, the north of Stone is constrained by Green Belt and as these settlements expand further, there are likely to be more environmental constraints that are encountered, such as, for example, topography, woodlands, and areas at higher risk of flooding. In addition, and as suggested in the consultation document, focusing too much on the redevelopment of previously developed land and sites within settlement boundaries can often mean that sites / buildings used for the provision of shops, services and employment are lost to meet the need and demand for housing.

A hybrid approach of expanding existing settlements and proposing new garden settlements would therefore be the most appropriate way of balancing social, economic and environmental considerations.

It is therefore considered that Growth Option 5 would be most compliant with the NPPF for the above reasons.

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.I	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>As already set out above, it is considered that the inclusion of a garden community is the most appropriate strategy to complement the growth of existing settlements and would take some development pressure off the existing settlements to enable the comprehensive delivery and funding of associated infrastructure.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.J	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>It is considered that growth options E and F with a partial catch up, no discounting and the provision of a garden community would be the most appropriate strategy for Stafford Borough to put forward as part of the emerging plan.</p> <p>Pursuing the Local Housing Need figure established using the standard methodology would not significantly boost the delivery of housing as required by the Framework, nor would it meet the substantial need for affordable housing or adequately take into account the need for specific groups, such as older persons housing. Economic scenario F of 683 (746) dwellings per annum would better align towards meeting open market and affordable housing needs and the needs of specific groups whilst also taking into account the economic growth strategy for the functional economic area.</p> <p>As already discussed, discounting the housing requirement using the basis of the current Local Plan is not supported because the only numbers that should be taken into account are existing commitments that should be rolled forward and taken into account in the figures for the early part of the plan period.</p> <p>The status of any current allocations that have yet to deliver housing should be reviewed to establish whether or not they are still likely to deliver housing over the course of the new plan period. In addition, all sites that are put forward should be assessed against the new definition of deliverable contained in the current version of the Framework for the purposes of establishing whether or not the plan will deliver a 5 year supply of deliverable housing sites upon adoption. Critically, this should be based upon a realistic assessment of lead in times and build out rates based upon locally available evidence.</p> <p>Given the high level of housing and economic need in the area, it is considered that spatial option 5 and 6 would be the most appropriate strategy to pursue because it is best placed to deliver sustainable development over the plan period by meeting current and future needs without placing undue pressure on existing settlements as well as taking into</p>					

account any environmental constraints surrounding some of the existing settlements. Likewise, some of the garden communities could be delivered on previously developed sites, such as former airfields or military bases, such as Hixon, where there are fewer environmental constraints and they are still located within reasonable proximity to Stafford and associated travel hubs such as the railway station and the strategic road network.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.L	<b>Other</b>	

**2. Please set out your comments below**

Yes we agree that the assumptions made in the EDHNA about the need to replace future losses of employment land are reasonable. It is considered that this is an important element of plan-making for future employment development requirements, as it is almost inevitable that some employment land in the Borough will be ‘lost’ to other uses during the plan period.

It is therefore critical that the Local Plan features a positive framework for economic (and other) growth to address this matter and the Borough’s overall economic development requirements and potential for general growth.

In turn we assert that our client’s land at Hixon Airfield should be brought forward for further employment development as an expansion to the existing RIE (and as a Major Urban Extension that would both make an important contribution towards delivering the Borough’s development requirements during the plan period of the new Local Plan and in turn further enhance the range of services and sustainability of this important settlement in relatively close proximity to Stafford).

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.M	<b>Other</b>	

**2. Please set out your comments below**

Yes, we consider that the new Local Plan should broadly mirror the spatial distribution for new employment prescribed by the current Plan.

Please also note our related comments in response to Question 5.N below.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.N	<b>Other</b>	

**2. Please set out your comments below**

Generally speaking we do not consider the employment distribution proposed by Table 5.10 for a New Plan to be reasonable in the case of the ‘with a Garden Community / Major Urban Extension’ option.

In our view, in the event that one or more Garden Communities / Major Urban Extensions comes forward the Local Plan should also facilitate some employment development / growth in suitable locations outside of the largest existing settlements of Stafford and Stone - and in particular at established Recognised Industrial Estates where available, suitable and deliverable land is available to enable them to grow - as part of a sustainable, balanced development strategy and in tandem with the potential for more general growth including housing development at such locations outside of Stafford and Stone.

It is considered that a 40-65% proportion of employment land in one or more Garden Villages / Major Urban Extensions is too high and overly ambitious. This would in our view amount to an over reliance on the new settlement(s)/extension(s) in question, particularly given the complications associated with delivering development at large developments of this nature such that they are unlikely to deliver meaningful amounts of development until much later in the plan period, likely making it unrealistic to achieve this proportion of the Borough’s employment development in the plan period.

Rather we consider that this proportion should be reduced and that 10-30% of employment land should be apportioned to the ‘Rest of the Borough’ in this scenario. Enabling such employment growth in other locations in the Borough would also better align with the intended strategy to enable proportionate housing development/growth across the Borough rather than just in Stafford, Stone and any Garden Community(s) / Major Urban Extension(s) that come forward.

As set out in response to other question and in our previous Local Plan and Call for Sites representations, we assert that our client’s land at Hixon Airfield should be brought forward for further employment development as an expansion to the existing RIE - and as a Major Urban Extension that would both make an important contribution towards delivering the Borough’s development requirements during the plan period of the new Local Plan and in turn further enhance the range of services and sustainability of this important settlement in relatively close proximity to Stafford.

In the event that our client’s land were included as a Major Urban Extension - and particularly if the new Plan did not also include provision of a new Garden Community - we consider this would increase the proportion of employment land that could be achieved in the ‘Garden Community / Major Urban Extension’ category of development,

given the likelihood that such development in this location is likely to be loss problematic than the development of an entirely new Garden Community. However even in that scenario we consider that the new Local Plan should allow for some employment land to be provided in the 'Rest of the Borough' for the reasons set out above.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.Q	<b>Other</b>	

**2. Please set out your comments below**

Yes we agree with the methodology used to define settlement boundaries.

Furthermore with regard to Development Principle 1 (including the commentary within paragraph 5.95) and Development Principle 2 (including the commentary within paragraph 5.97) we consider that our client's land at Hixon Airfield comprises open areas of land on the edge of the settlement that are appropriate for employment development and to deliver a Major Urban Extension (as considered in more detail in our response to other questions and within our previous Local Plan and Call for Sites representations).

Given the clear strong development potential of our client's land and factors such as it featuring clear/obvious, logical and defensible boundaries to both physically contain and mitigate the potential impact of future development within the site, we assert that our client's land comprises an entirely suitable and logical development sites that - taking into account and in accordance with the proposed methodology to define settlement boundaries - should be included within the settlement/RIE boundary of Hixon and identified as a Major Urban Extension in the new Local Plan as appropriate.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	6.A	<b>Other</b>	

**2. Please set out your comments below**

The HEDNA assessment by Lichfields that forms part of the evidence base suggests that employment needs range from 68 hectares to 181 hectares of employment land.

Table 6.1 of the consultation document identifies three levels of employment space requirements, ranging from 17,548 square metres of floor space to 176,568 square metres of employment space.

It is considered that the higher "policy-on" level of employment space should be provided (176,568 square metres) to enable a greater degree of choice and flexibility in the

provision of employment space, as well as ensuring that appropriate space is available to take into account any losses of employment land that may occur, such as change of use from offices to dwellings under Class O of the GPDO.

However, it is noted from the consultation document that whilst comments are invited on the amount of floor space that should be accommodated for in the plan, there doesn't appear to be any suggestion as to the amount of employment land that might be required as a result.

The amount of employment land that is required should therefore be closer to the 181 hectares identified in the Lichfields study to enable greater choice and flexibility of a range of employment floorspace needs from offices to large distribution centres.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	6.B	<b>Other</b>	

**2. Please set out your comments below**

To ensure optimal economic prosperity, we consider that the Council should allocate employment land so that it extends existing employment premises / areas in and throughout the Borough - and in turn allocate employment land in both urban and rural areas. It is considered that a range of locations should be considered for employment development including existing settlements, rural areas and any proposed garden community. We have explained our key reasoning for this view within our response to Question 5.N.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	6.C	<b>Other</b>	

**2. Please set out your comments below**

As set out in more detail in our responses to other questions, we consider that our client's land at Hixon Airfield should be brought forward for further employment development as an expansion to the existing RIE (and as a Major Urban Extension that would both make an important contribution towards delivering the Borough's development requirements during the plan period of the new Local Plan and in turn further enhance the range of services and sustainability of this important settlement in relatively close proximity to Stafford).

In terms of particular locations, it is considered that the Hixon Airfield site could accommodate a range of Class B employment uses, and expanded employment provision here would add to the existing employment development that already exists

here and would form a larger employment cluster in close proximity to Stafford. In addition, this could be delivered either alone, or as part of any proposed Garden Community at Hixon, therefore enabling homes to be delivered in close proximity to a range of large scale employment opportunities, therefore reducing the need to travel large distances from home to work and facilitate access to employment through sustainable modes of transport, in particular walking and cycling.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	6.D	<b>Other</b>	

**2. Please set out your comments below**

A zoning approach to identifying employment land is considered to be a sensible approach. In recent years, the nature of employment development has evolved greatly, in particular online retail, the need for warehousing space, and the need for flexible employment space to meet evolving and changing needs.

Given the fast changing and evolving nature of the economy and technology, local planning is often playing “catch up”, and the less frequent updates to local and national planning policy often mean that land allocations for specific employment uses within Class B can constrain or slow down the delivery of new employment opportunities because a new type of employment development might be contrary to a particular policy or allocation within a development plan that is adopted a few year prior.

Therefore, it is considered that a flexible zoning approach should be considered which consider all types of Class B uses, and other forms of development outside of Class B uses that generate significant levels of employment could be allowed, subject to there being robust evidence submitted with any non-Class B use to demonstrate the levels of employment that would be provided. This would give the planning process a greater degree of flexibility to respond to a constantly changing economy.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	6.H	<b>Other</b>	

**2. Please set out your comments below**

It is unclear if the Council considers settlements such as Hixon to be a rural area in the context of this question, but in any event and as set out in more detail in our response to Question 5.N we assert that the rural areas/’Rest of the Borough’ should accommodate a good proportion of employment land/growth/development in the plan period, regardless of whether a Garden Community(s) / Major Urban Extension(s) comes forward.

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	8.A	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>With regard to the development of previously developed land, the Framework does not prioritise the development of brownfield land over greenfield land, but rather, it requires strategic policies to set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed land (Framework paragraph 117).</p> <p>The key for the Local Plan is to ensure that objectively assessed needs can be met and that a 5 year housing land supply can be maintained throughout the plan period. This can be maintained through the release of both previously developed land and greenfield land. In particular, a “brownfield first” policy should be avoided, as in some cases, previously developed land can be slower to come forward for development than greenfield land, and this therefore has implications for maintaining a 5 year housing land supply to an extent such that additional development on unallocated greenfield sites comes forward because it will be necessary to engage the “tilted balance” of paragraph 11d of the Framework, hence additional greenfield development ends up being an unintended consequence of any “brownfield first” policy.</p>				

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	8.B	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>With regard to density thresholds, this should be flexibly applied relevant to the prevailing character of the area as well as the need to accommodate any physical or social infrastructure. In particular, the emerging legislative requirement for biodiversity net gain is an important consideration as part of the overall density of development that might be accommodated on particular allocations, so a blanket density approach should be avoided.</p>				

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	8.F	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>With regard to housing mix, a housing mix range is presented as a possible policy approach to the type of housing that is delivered. It is considered that the “range” approach is more suitable to give flexibility to housing developers, as well as enable appropriate densities to be achieved on each site.</p> <p>For example, it may not be appropriate to expect a larger allocation to deliver around 30% 1-bed units, because it would be an inefficient use of land. Sometimes, a range of house sizes can be a blunt tool in terms of setting out the appropriate housing mix. What is usually more appropriate is to set out policies on specific needs that should be addressed, in terms of the proportion of affordable housing, older persons housing, first time buyers housing, etc. that is required, rather than solely identifying a mix of house types as a policy requirement.</p>				

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	8.K	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>With regard to the affordable housing range, it is considered that the range of 252-389 affordable homes per annum would be achievable as long as a sufficient amount of larger housing allocations, urban extensions and garden communities are allocated and delivered.</p> <p>For example, a garden village of around 3000 dwellings would deliver around 900 affordable homes if 30% of the homes to be delivered were to be provided as affordable units. This equates to some 2.3 - 3.5 years of affordable housing supply.</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-](http://www.staffordbc.gov.uk/new-local-plan-)

Please e-mail your comments (Preferred) to: [forwardplanning@staffordbc.gov.uk](mailto: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](http://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](mailto:forwardplanningconsultations@staffordbc.gov.uk)

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

<b>Part A: Your Details (Please Print)</b>		
<b>Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.</b>		
	<b>Your Details</b>	<b>Agent’s Details (if applicable)</b>
<b>Title</b>		Mr
<b>First Name</b>		Ben
<b>Surname</b>		Weatherley
<b>E-mail address</b>		
<b>Job title (if applicable)</b>		Partner
<b>Organisation (if applicable)</b>	M J Barrett Group Limited	Knights plc
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone Number</b>		

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](mailto: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](http://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.

<b>Part B: Your Comments</b>				
<i>Please complete a new Part B for each representation you wish to make.</i>				
<b>Name</b> Knights plc		<b>Organisation</b> M J Barrett Group Limited		
<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	5.B	<b>Other</b>
<b>2. Please set out your comments below</b>				
<b>5.B(a) Housing requirement</b>				
<p>The housing requirement figure for Stafford Borough should be based on actual / objectively assessed needs, taking into account actual need for affordable housing, older persons housing need and actual household formation rates. The Council should not rely on figures established through the Standard Method because the figures used to establish Local Housing Need under the Standard Method rely on past trends. Such past trends rely on suppressed household formation rates which the Standard Method extrapolates into the future. This means real households in actual need will not get the homes that are needed. It is understood that the Government are reviewing the Standard Methodology, so using the figure established under the Standard Method should in our view be taken with a huge degree of caution.</p> <p>Further to the above, national policy requires authorities to significantly boost the supply of housing. The Standard Method figure of 408 dwellings per annum is 20% lower than the adopted housing requirement figure of 500 dwellings per annum established in the extant Local Plan. Therefore, the Standard Method figure would not “significantly boost” the supply of housing as required by the Framework.</p>				
<b>5.B(b) Partial catch up rate</b>				
<p>With regard to using a partial catch up rate, this aspect of establishing the housing requirement is supported. The housing requirement established using the Standard Method in effect “wipes the slate clean” so any unmet need from previous years does not get adequately projected into the future, and this would particularly be the case in Stafford Borough because the Standard Method figure is substantially lower than the adopted housing requirement figure.</p> <p>By way of illustration, the Council’s affordable housing need is identified as being in the region of 252 - 389 affordable homes per annum. The Standard Methodology uplift of 21% (Table 5.1 of the consultation document) suggests that the affordability uplift would add in the region of 57-70 dwellings per annum to the annual housing requirement figure established using the Standard Method which highlights its main flaw in that it does not</p>				

reflect actual need. It is therefore clear that the Standard Method figure should not be used as the basis of the new Local Plan.

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

<b>Section</b>		<b>Paragraph</b>	5.23 & 5.24	<b>Table</b>	
<b>Figure</b>		<b>Question</b>		<b>Other</b>	

**2. Please set out your comments below**

The consultation document confirms (including within paragraphs 5.23 and 5.24) that the Council assumes that the Borough’s development needs for the plan period can be accommodated on land not designated as Green Belt.

However in our view the Council should not dismiss entirely the potential for relatively small adjustments to the boundaries and extent of the Green Belt where this offers the potential to achieve preferable development solutions to meet the Borough’s development needs to 2040 and ultimately more deliverable and sustainable, well-planned development, whilst at the same time not prejudice the purposes of including land in the Green Belt due to the siting, nature and other relevant characteristics of the potential land release involved.

In the case of our client’s land adjacent to the A34, towards the northern outskirts of Stone - SHELAA Site ID SRUR13 - in relation to potential development at Stone specifically (as the second largest town in the Borough and which will presumably need to accommodate additional housing, retail, employment and other development to meet existing and future needs for such development in the plan period) we consider that it is premature to reach the conclusion that it is not necessary to release land from the Green Belt to meet the Borough’s development requirements during the plan period, until more detailed assessment of the potential to meet the Borough/town’s development requirements on non-Green Belt land has been undertaken.

We respectfully request that the LPA gives due consideration to the need to undertake a Green Belt Review/consider the requirements to release land from the Green Belt in order to meet the development requirements of the Borough and Stone specifically.

It is considered that, as a result of its proximity/frontage to the A34 and established housing on the opposite (north east) side of the Trent and Mersey Canal, our client’s site lends itself to retail and housing development in particular.

On the matter of potential retail development specifically, our previous Call for Sites representations included details of an expressions of interest in the site from Lidl that M J Barrett Group has received. The letter from Lidl at Appendix C to that representation confirms that:

- As part of their rapid UK wide expansion programme Lidl GB Limited are currently reviewing potential sites within Staffordshire that would fulfil their site profile for future development and this site has been identified as one of potential interest for development subject to existing highways and planning constraints being fulfilled to enable site delivery;
- The existing Plan for Stafford Borough and the Council's Retail Capacity Report (2013) highlights a need for future retail floorspace within the Borough and a quantitative and qualitative need for a medium sized foodstore in Stone, which would help to address the over trading of the Mill Street Morrisons store;
- The recently constructed and now trading M&S Foodhall at Westbridge Park reduced the capacity for new convenience floorspace in Stone by 855 sqm (net), although there is still circa 800 sqm convenience capacity remaining of the 1,700 sqm (net) requirement set out in Policy Stone 1;
- Circa 2 acres / 0.8 hectares of land would be needed to deliver a foodstore and associated parking provision on a location that is a main arterial route through the town and the foodstore itself would have a sales area floorspace of circa 1256 sqm with an overall GIA of circa 1900 sqm;
- Lidl have been searching for a suitable site to accommodate a store in Stone for some time and consider it highly unlikely that a site of sufficient size and with suitable characteristics to meet their requirements could be identified in a non-Green Belt location in the town and that the subject site is the only location in town suitable for their requirements.

We are aware of other potential development sites on the periphery of Stone including those featured in the SHELAA, but it is our understanding that all such potential alternative sites have technical challenges to their future development and/or are not in a suitable location, particularly from the perspective of a convenience/food retailer's perspective (such as Lidl).

Furthermore and as set out in more detail in our response to Question 7.A these representations are accompanied by evidence of need for additional retail development in Stone.

With the above in mind it is considered that:

- our client's site has strong potential to accommodate a foodstore to help meet the town's existing need for such development, which will presumably only increase during the plan period of the new Local Plan; and
- the combination of the need for additional food retail in the town and potential absence of sequentially preferable and non-Green Belt sites to genuinely deliver new development to meet this need could form part of the 'exceptional circumstances' justification required to alter the Green Belt boundary in this location and enable the site's future development.

Given that the total site is 3.2 hectares in size and only circa 0.8 hectares of land would be required to accommodate a foodstore such as a Lidl store - and that given the physical characteristics of the site, if it were to be released from the Green Belt to enable its development it would be reasonable to remove the entire site from the Green Belt - the

site could consequently accommodate additional retail development and/or housing development.

Further to the point above, due in particular to the site's elongated nature and position sandwiched in between the A34 to the west and Trent and Mersey Canal and housing beyond to the east, in our view the site's development/removal from the Green Belt would not prejudice any of the purposes of including land in the Green Belt (as set out at paragraph 134 of the NPPF). Clearly this matter would be given more detailed consideration as part of a Green Belt Review if such a review were to be carried out, but in the meantime our own initial view is that removal of the entire site from the Green Belt would be logical, particularly given that the A34 forms a strong physical and defensible potential Green Belt boundary.

Although located in Green Belt outside the existing Stone settlement boundary, the site is just circa 1.2 km from (to the north west of) Stone Town Centre. Given the proximity of the A34, an existing bus stop (close to the northern end of the site and connecting to an excellent bus service that connects to Stafford, Stoke-on-Trent and elsewhere) and canal towpath the site also benefits from excellent pedestrian and cycle connections to the town centre and existing local amenities elsewhere.

The excellent public transport and road/footpath/cycle connections between the site and the centre of Stone and elsewhere offer the potential for multi-purpose trips e.g. paying a visit to the town centre by sustainable mode of transport prior to or following a visit to a foodstore within the site.

It is also considered that, again given its proximity to and long frontage to the A34, there is strong potential to achieve satisfactory access to the site to serve its development. Indeed the potential to achieve this has been subject of previous discussions with the highway authority and further information can be provided on request if required.

The site's constraints include that there are trees and other vegetation on the site perimeter and in two lines crossing the site. It is not anticipated that the vegetation within the site would prevent development taking place. Rather it is considered that the vegetation within the site is potentially a key merit of the site in terms of providing soft and attractive boundaries to its future development and that - subject to more detailed assessment if/when preparing a development proposal in future (e.g. at planning application stage) - a landscaping scheme could be prepared to ensure the provision of appropriate replacement planting where required and a high quality landscape setting to the development overall.

It is also noted that the section of the Trent and Mersey Canal that adjoins/runs parallel to the north east site boundary is a conservation area. However it is not considered that this would prevent development taking place, but rather care would need to be taken to ensure that any future development within the site is well designed to respect and ensure an acceptable impact on the conservation area - just as numerous other development proposals in Stone have done in the past.

There are no other known constraints affecting the site, including taking account of a preliminary ecological appraisal, ground search and utilities desk top studies undertaken

in the past (further details of which can be provided to the LPA on request if required to inform their assessment of the site).

With all the factors above in mind we consider that the site’s development potential - and more broadly the potential need to release land in the Green Belt on the edge of Stone in order to meet the town’s development requirements in the plan period of the New Local Plan - should be assessed by the LPA.

With all these points considered we therefore encourage the Council to reconsider its current approach to dismissing altogether the possibility of one or more minor adjustments to the Green Belt to enhance the deliverability of the Local Plan and its performance in terms of achieving development in sustainable locations that would meet the identified needs of the local community.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.C	<b>Other</b>	

**2. Please set out your comments below**

It is our position that there should not be a discount for the 6,000 units currently provided for to date. The only numbers that should be taken into account are existing commitments that should be rolled forward and taken into account in the figures for the early part of the plan period.

The status of any current allocations that have yet to deliver housing should be reviewed to establish whether or not they are still likely to deliver housing over the course of the new plan period. In addition, all sites that are put forward should be assessed against the new definition of deliverable contained in the current version of the Framework for the purposes of establishing whether or not the plan will deliver a 5 year supply of deliverable housing sites upon adoption.

Critically, this should be based upon a realistic assessment of lead in times and build out rates based upon locally available evidence. A useful starting point is the “Start to Finish (second edition)” document by Lichfields ( <https://lichfields.uk/content/insights/start-to-finish>).

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	5.D	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>We agree with the basis for the preparation of the 2019 Settlement Hierarchy.</p> <p>We also agree that the smaller settlements should be included in the Settlement Hierarchy in the new Local Plan.</p> <p>We specifically support the inclusion of Stone at in the second level of the Settlement Hierarchy.</p> <p>We therefore support the proposed inclusion of Stone in the Settlement Hierarchy and, with reference to our response above to paragraphs 5.23 and 5.24, respectfully request that the LPA gives due consideration to the potential to identify our client’s land as a development site on the edge of Stone.</p>				

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	5.F	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>The consultation document puts forward a range of potential spatial scenarios, summarised as follows:</p> <ol style="list-style-type: none"> <li>1. Intensification of town and district centres</li> <li>2. Garden communities</li> <li>3. Dispersal of development</li> <li>4. Intensification around the edges of larger settlements and strategic extensions</li> <li>5. String settlement clusters</li> <li>6. Wheel cluster settlements focussed on Stafford and surrounding settlements</li> </ol> <p>In terms of which scenarios should be avoided, a sole strategy of intensifying existing town and district centres should be avoided because this strategy alone is unlikely to be compliant with the NPPF in terms of allowing the Council to meet all of its identified development needs, and likewise, it is unlikely to enable the delivery of sustainable development in rural areas through restricting development there.</p> <p>None of the strategies suggested should be pursued on their own, and it is considered that a combination of dispersing development, intensifying the edges of larger settlements / strategic extensions, the provision of one or more garden communities and the “wheel cluster” around Stafford approach would be the most suitable option.</p>				

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.G	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>Yes we consider a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying the Borough’s future development requirements.</p> <p>However whichever approach the Local Plan takes in this respect, we consider that it should make provision for Stone to accommodate a reasonable amount/proportion of the Borough’s development requirements in any event given that it is the second largest town in the Borough (and second in the proposed Settlement Hierarchy accordingly).</p> <p>Furthermore as set out in our response to Question 7.A and accompanying evidence there is already a need for provision of additional convenience/food retail in the town and we anticipate that need is only going to increase during the plan period, therefore even in the event a new Garden Community / Major Urban Extension is to be provided there is a need for Stone to accommodate such development along with housing growth at suitable, available and deliverable locations.</p>					

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>					
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.H	<b>Other</b>	
<b>2. Please set out your comments below</b>					
<p>The consultation paper puts forward a range of potential strategies and rightly acknowledges that smaller / piecemeal expansion and infilling can often provide significant numbers of dwellings but without necessarily delivering appropriate amounts of physical and social infrastructure. Therefore the appropriate strategy needs to find the right balance between providing housing and employment where it is needed, but with appropriate infrastructure in place to support new and existing communities.</p> <p>In this case, Growth Option 5, which seeks to disperse development across the new settlement hierarchy with a new Garden Community / settlement, combining options that include the “Intensification of Town and District Centres”; “Intensification of edges of larger settlements and strategic extensions”; “Garden Communities”; and “Dispersal of development” is considered to be the most appropriate in terms of striking the right balance between meeting the needs of existing communities whilst not placing an undue burden on existing services and infrastructure, whilst creating new significantly larger communities with appropriate new services and infrastructure to meet their needs.</p> <p>It is considered that the creation of garden communities of more than 2,500 dwellings or more would enable services and infrastructure to be properly planned for the area and in addition, the intensification and expansion of existing settlements would, in the short</p>					

term, enable the Council to maintain a 5 year housing land supply at the early stage of the new local plan period with the larger developments and garden communities coming forward later in the plan period to enable to the Council to maintain a 5 year housing land supply later in the plan period. This option is considered to be the best opportunity to ensure that the “plan-led” system is maintained throughout the plan period by ensuring a continuous supply of deliverable housing sites throughout.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	5.J	<b>Other</b>	

**2. Please set out your comments below**

It is considered that growth options E and F with a partial catch up, no discounting and the provision of a garden community would be the most appropriate strategy for Stafford Borough to put forward as part of the emerging plan.

Pursuing the Local Housing Need figure established using the standard methodology would not significantly boost the delivery of housing as required by the Framework, nor would it meet the substantial need for affordable housing or adequately take into account the need for specific groups, such as older persons housing. Economic scenario F of 683 (746) dwellings per annum would better align towards meeting open market and affordable housing needs and the needs of specific groups whilst also taking into account the economic growth strategy for the functional economic area.

As already discussed, discounting the housing requirement using the basis of the current Local Plan is not supported because the only numbers that should be taken into account are existing commitments that should be rolled forward and taken into account in the figures for the early part of the plan period.

The status of any current allocations that have yet to deliver housing should be reviewed to establish whether or not they are still likely to deliver housing over the course of the new plan period. In addition, all sites that are put forward should be assessed against the new definition of deliverable contained in the current version of the Framework for the purposes of establishing whether or not the plan will deliver a 5 year supply of deliverable housing sites upon adoption. Critically, this should be based upon a realistic assessment of lead in times and build out rates based upon locally available evidence.

Given the high level of housing and economic need in the area, it is considered that spatial option 5 and 6 would be the most appropriate strategy to pursue because it is best placed to deliver sustainable development over the plan period by meeting current and future needs without placing undue pressure on existing settlements as well as taking into account any environmental constraints surrounding some of the existing settlements.

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	5.Q	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>Yes we agree with the methodology used to define settlement boundaries - subject to our earlier comments in response to paragraphs 5.23 and 5.24 concerning the need to consider the release of some land from/some minor adjustments to the Green Belt where potential development sites lend themselves to justifying this approach being taken and delivering preferable development solutions to other available land elsewhere.</p> <p>Furthermore with regard to Development Principle 1 (including the commentary within paragraph 5.95) and Development Principle 2 (including the commentary within paragraph 5.97) we consider that our client’s site in Stone comprises an open area of land on the edge of the settlement that is appropriate for retail development (the need for which is evidenced in our response to Question 7.A), whilst the balance of the site within the clear, logical and defensible site boundaries lends itself to housing development, which would comprise a suitable rounding off opportunity on the edge of Stone without compromising the purposes of including land in the Green Belt (and , as considered in more detail in our response to paragraphs 5.23 and 5.24 and within our September 2019 Call for Sites submission).</p> <p>With all these points in mind we assert that our client’s land adjoining the A34 in Stone comprises an entirely suitable and logical development site that - taking into account and in accordance with the proposed methodology to define settlement boundaries - should be included within the settlement boundary of Stone in the new Local Plan.</p>				

<b>1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?</b>				
<b>Section</b>		<b>Paragraph</b>		<b>Table</b>
<b>Figure</b>		<b>Question</b>	7.A	<b>Other</b>
<b>2. Please set out your comments below</b>				
<p>We have no objection to the hierarchy for Stafford Borough consisting of Stafford and Stone town centres with Eccleshall local centre.</p> <p>However in response to Question 7.A b), we do not agree with the level of future retail convenience floorspace provision and associated evidence within the Stafford Borough Town Centre Capacity Assessment.</p> <p>These representations are accompanied by a report by WSP Indigo that features a review of the Town Centre Capacity Assessment (TCCA) for Stafford Borough. The report concludes that:</p>				

- There are significant concerns regarding a number of technical aspects and assumptions made in the TCCA which has, and will have serious implications on the soundness of the new Local Plan, given it should be underpinned by an accurate and up-to date evidence base. It is considered that the issues that have been identified will have considerable implications for the capacity findings of the TCCA for the Borough, including in Stone.
- On this basis the floorspace capacity figures should be recalculated to take account of the concerns raised because they underestimate the level of retail capacity and will mean that the Plan does not meet its retail need.
- Moreover, it is clear that there remains a need for a new foodstore in Stone because the existing Aldi is significantly overtrading to enhance consumer choice and competition to the benefit of local residents.
- The TCCA only identifies the former Stone police station as a potential site to accommodate new retail floorspace in Stone town centre. However, this only extends to 250sqm, and it is of insufficient size to accommodate a foodstore that will be able to deliver choice and competition.
- However, our client's land adjacent to the A34 in Stone represents an available and suitable site to deliver a new Lidl foodstore to serve the shopping needs of existing and future residents and workers in the local area.

Please also refer to our response to Question 7.B and other sections of these representations including our response to paragraphs 5.23 and 5.24 (and our September 2019 Call for Sites representations) where we have summarised the key factors associated with our case in support of the development of our client's land adjoining the A34 on the northern outskirts of Stone to meet this need for retail development (in addition to housing development within the remaining balance of the site and its logical and defensible boundaries).

**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**

In response to Question 7.B a), yes we do consider that the future approach to the centre of Stafford, Stone and Eccleshall should be based on their respective distinctive characteristics.

However and taking account of our response to Question 7.A (that identifies a need for additional retail development in Stone) and the distinctive characteristics of Stone town centre, we do not consider that the retail development needs of the town can be accommodated within the proposed town centre boundary.

As mentioned in our response to Question 7.A above, the WSP Indigo report only identifies the former Stone police station as a potential site to accommodate new retail floorspace in Stone town centre. However, this only extends to 250sqm, and it is of

insufficient size to accommodate a foodstore that will be able to deliver choice and competition.

As a result and in particular given how tightly constrained Stone town centre is, including by the likes of housing development, the canal, road infrastructure, Westbridge Park and heritage assets, we consider that a site outside the town centre will need to be utilised to deliver the additional retail development that is already needed - the need for which will only increase during the plan period (as per our response to Question 7.A) - in an accessible, sustainable location.

Further to our responses elsewhere within these representations, including in response to paragraphs 5.23 and 5.24, we consider that our client’s land adjoining the A34 in Stone presents an excellent opportunity to deliver such development. Indeed our 2019 Call for Sites representations included a letter from Lidl comprising an expression of interest in site and confirming its suitability (both in terms of location and its size and other physical characteristics) to deliver the form of retail development that is needed.

Given the absence of suitable and viable alternative sites elsewhere in the town and other factors such as the high accessibility/sustainability of the location of our client’s site and its logical and defensible boundaries, we consider that an adjustment to the Green Belt boundary is justified in this instance to enable this needed development to come forward within an area of land that (principally as a result of previous development and the adjoining road infrastructure) would not prejudice the purposes of including land in the Green Belt if it were removed from the Green Belt and allocated for development.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	8.A	<b>Other</b>	

**2. Please set out your comments below**

With regard to the development of previously developed land, the Framework does not prioritise the development of brownfield land over greenfield land, but rather, it requires strategic policies to set out a clear strategy for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed land (Framework paragraph 117).

The key for the Local Plan is to ensure that objectively assessed needs can be met and that a 5 year housing land supply can be maintained throughout the plan period. This can be maintained through the release of both previously developed land and greenfield land. In particular, a “brownfield first” policy should be avoided, as in some cases, previously developed land can be slower to come forward for development than greenfield land, and this therefore has implications for maintaining a 5 year housing land supply to an extent such that additional development on unallocated greenfield sites comes forward because it will be necessary to engage the “tilted balance” of paragraph 11d of the Framework,

hence additional greenfield development ends up being an unintended consequence of any “brownfield first” policy.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	8.B	<b>Other</b>	

**2. Please set out your comments below**

With regard to density thresholds, this should be flexibly applied relevant to the prevailing character of the area as well as the need to accommodate any physical or social infrastructure. In particular, the emerging legislative requirement for biodiversity net gain is an important consideration as part of the overall density of development that might be accommodated on particular allocations, so a blanket density approach should be avoided.

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

<b>Section</b>		<b>Paragraph</b>		<b>Table</b>	
<b>Figure</b>		<b>Question</b>	8.F	<b>Other</b>	

**2. Please set out your comments below**

With regard to housing mix, a housing mix range is presented as a possible policy approach to the type of housing that is delivered. It is considered that the “range” approach is more suitable to give flexibility to housing developers, as well as enable appropriate densities to be achieved on each site.

For example, it may not be appropriate to expect a larger allocation to deliver around 30% 1-bed units, because it would be an inefficient use of land. Sometimes, a range of house sizes can be a blunt tool in terms of setting out the appropriate housing mix. What is usually more appropriate is to set out policies on specific needs that should be addressed, in terms of the proportion of affordable housing, older persons housing, first time buyers housing, etc. that is required, rather than solely identifying a mix of house types as a policy requirement.

***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-](http://www.staffordbc.gov.uk/new-local-plan-)

Please e-mail your comments (Preferred) to: [forwardplanning@staffordbc.gov.uk](mailto: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](http://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](mailto:forwardplanningconsultations@staffordbc.gov.uk)

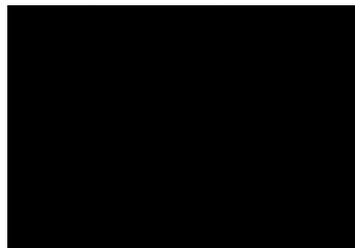
# WSP Indigo Review of Town Centre Capacity Assessment for Stafford Borough

# WSP Indigo Review of Town Centre Capacity Assessment for Stafford Borough

April 2020

**WSP Indigo**

**wsp indigo.**  
Indigo Planning Limited



# **WSP Indigo Review of Town Centre Capacity Assessment for Stafford Borough**

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# 1. Introduction

- 1.1. WSP Indigo have reviewed the findings of the **Town Centre Capacity Assessment (TCCA) for Stafford Borough 2019** on behalf of M J Barrett to support their representations to the new Stafford Local Plan seeking the allocation of land adjacent to the A34 in Stone for mixed uses, including housing and a new Lidl foodstore.
- 1.2. We have concerns regarding the findings of the TCCA which calls into question its soundness as part of the evidence base for the Local Plan. As a result, we do not agree with the level of future retail convenience floorspace provision in response to Question 7.A of the Issues & Options document.
- 1.3. Table 8.1 of the TCCA provides a summary of the retail floorspace requirements between 2019 and 2040 within the Borough identifying 'negative' capacity for additional convenience floorspace. It does, however, identify capacity for circa 14,000 sqm of comparison floorspace. As such paragraph 8.2.2 states that: "*there isn't a quantitative need for additional convenience retail provision*". Paragraph 8.2.3 adds that there is also not a qualitative need for additional convenience retail provision over the study period.
- 1.4. These findings are contrary to the recommendations of the previous Stafford and Stone Town Centre Retail Study 2013 which highlighted a need for future retail floorspace within the Borough, including a quantitative and qualitative need for a medium sized foodstore in Stone, which would help to address the overtrading of the Mill Street Morrisons store. Whilst it is recognised that an M&S Simply Food has opened in Stone since the previous Retail Study, this primarily caters for top shopping up rather than main food shopping, and so there remains a need for another foodstore in Stone to address overtrading and provide choice and competition.
- 1.5. We set out in the following section our concerns regarding a number of the assumptions of the TCCA which undermine the credibility of the document and its validity as evidence for the emerging Local Plan.

## 2. Review of TCCA

### Introduction

- 2.1. The following sets out our comments on various matters in the TCCA, including the household survey, population and expenditure estimates, turnover of existing facilities and overtrading, retail commitments, and future retail capacity.

### Household Survey

- 2.2. The TCCA is underpinned by a new household survey of 800 households across the Study Area which is split into 8 zones including Zone 2 where land adjacent to the A34 is located. However, the previous household survey from the 2013 Retail Study was based on 1,000 households, and therefore it is unclear why a smaller number of households have been interviewed in the updated survey.

### Population and Expenditure

- 2.3. Paragraph 6.2.3 of the TCCA confirms that the population projections used in the capacity assessment are sourced from the ONS as shown in Spreadsheet 1 in Appendix D. It is, therefore, assumed that they do not take into account local housing targets. Paragraph 8.8.1 recognises that the Council should have regard to the rate of housing development in the Borough to determine likely changes to retail floorspace requirements. As far as we can tell, this has not happened so the population data is flawed.
- 2.4. The population figures should therefore be amended to include housing requirements in the Borough, in particular the Local Plan Issues and Options identifies at paragraph 5.11 that there are approximately 3,000 planning commitments (essentially planning permissions and under construction) and 3,000 homes uncommitted on Strategic Development Locations including in Stone totalling 6,000 homes which will be delivered between 2020-2031). If allowance is made for these housing commitments and proposed houses this will significantly increase the population in the Borough and subsequent total expenditure. For example, assuming 2.4 persons per dwelling, this would equate to potentially an additional 14,400 people living in the Borough by 2031, and an additional circa £30m of expenditure.
- 2.5. In addition to the 6,000 homes already committed/planned for, the new Local Plan will provide the framework for additional housing growth and employment development through to 2040. Given that Stone is the second largest town in the Borough and the second settlement in the new settlement hierarchy accordingly, the new Local Plan should support further growth in the town that would in turn increase population and expenditure in the local area further still.
- 2.6. The convenience goods expenditure figures in Spreadsheet 2 also do not include any allowance of inflow which would increase the amount of expenditure within the Study Area including inflow to Zone 2 which includes Stone Business Park and Whitebridge Industrial Estate. According to the Council's Economic and Housing Development Needs Assessment 2020 a large number of people are employed in the manufacturing, transportation and storage, information and communication and wholesale and retail sectors across Stone Business Park which covers over 70ha. It has also recently been extended further to include an additional 21ha of employment land.
- 2.7. Many of those employed will live outside Stone, but will visit retail facilities in Stone. This inflow, and potential inflow, should be accounted for in the assessment. This inflow, and

potential inflow, should be accounted for in the assessment, as should the strong possibility of the potential inflow further increasing as a result of any new additional land/development in Stone that will be facilitated by the new Local Plan.

- 2.8. These flaws in the assessment undermine the findings of the TCCA and indicate the need for additional convenience retail provision in Stone to serve both the expanding population as well as existing and future employees at the Business Park and Industrial Estate.

### Turnover of Existing Stores and Overtrading

- 2.9. The TCCA calculates the turnover of existing stores and facilities in the Study Area based on market shares from the household survey. However, it is unclear what split has been used between main and top up shopping expenditure to calculate these turnovers.
- 2.10. More fundamentally, the TCCA does not provide a comparison between the benchmark turnovers of these stores (based on their company average sales densities) and their market share turnover to establish whether they are overtrading or underperforming. The 2013 Retail Study identified that a number of the existing stores in the Study Area were significantly overtrading, including in Stone. This highlights an undersupply of convenience goods floorspace within the area and need for new floorspace.
- 2.11. It is very possible that if stores were overtrading in 2013, they will be overtrading now. The TCCA confirms this. Based on the household survey, the TCCA estimates that the Aldi store will have a convenience turnover of £19.4m. However, based on a benchmark turnover Aldi's convenience turnover would be circa £9.5m, showing that it is significantly overtrading ie by over £10m (50%). This confirms both a quantitative and qualitative need for another foodstore in Stone to meet this latent demand, and to improve consumer choice and competition in the area.
- 2.12. The turnover of proposed Lidl on land adjacent to the A34 in Stone would address this level of overtrading and as such it is unlikely to have a significant impact on existing local provision because it would absorb some of the money currently spent at the overtrading, out-of-centre Aldi store, rather than taking expenditure from local stores.
- 2.13. Overtrading of existing stores must be taken into account in the capacity assessment given it is an important indication of whether there is a quantitative and/or qualitative need for new retail floorspace.
- 2.14. Indeed, to seek to prevent another retailer entering the market is anti-competitive and will simply reinforce Aldi's monopoly in Stone. This conflicts with paragraph 89 of the NPPF and will disadvantage consumers. The new residents and workers will have little choice, but to use a store that is already significantly overtrading.

### Commitments

- 2.15. It is also unclear if the two convenience retail commitments identified in Spreadsheet 6 have been implemented and are, therefore, still extant given that the permission for the two retail units at Queensville and supermarket at land south of Creswell Grove in Stafford were granted five and seven years ago respectively. As such, there must be significant doubt that these schemes will come forward and they should not be treated as retail commitments. A commitment should only be accounted for if it will come forward. Again, this will have implications for retail capacity in the Borough and the TCCA should be amended to reflect this.

## Future Retail Capacity

- 2.16. The TCCA assumes a constant market share and retention rate for convenience facilities over the plan period (Spreadsheet 7), which is the proportion of expenditure on convenience goods spent in town centres and stores located within the Study Area. On this basis it assumes 'negative' capacity for future retail convenience floorspace.
- 2.17. However, given the identified housing growth within the Local Plan, including in Stone which is identified as the second largest settlement in the Borough, it would be an appropriate strategy to plan for an increase in market shares which would increase the amount of available expenditure to support new retail floorspace. In particular there is scope to increase the amount of trade retained in Zone 2 above 70% (for example to 80%) through the delivery of a new foodstore.
- 2.18. Furthermore, the assumed sales density for future retail floorspace in Spreadsheet 7 is too high (ie £11,500 per sqm). Discount retailers such as Lidl and Aldi have significant lower sales densities.
- 2.19. In addition, foodstores generate new employment and are important employers in the economy. Allowing new convenience floorspace will therefore help to increase employment opportunities in the borough.

### 3. Conclusion

- 3.1. In summary, we have significant concerns regarding a number of technical aspects and assumptions made in the TCCA which has, and will have serious implications on the soundness of the new Local Plan, given it should be underpinned by an accurate and up-to-date evidence base. We consider that the issues that we have identified will have considerable implications for the capacity findings of the TCCA for the Borough, including in Stone.
- 3.2. On this basis the floorspace capacity figures should be recalculated to take account of the concerns raised because they underestimate the level of retail capacity and will mean that the Plan does not meet its retail need.
- 3.3. Moreover, it is clear that there remains a need for a new foodstore in Stone because the existing Aldi is significantly overtrading to enhance consumer choice and competition to the benefit of local residents.
- 3.4. The TCCA only identifies the former Stone police station as a potential site to accommodate new retail floorspace in Stone town centre. However, this only extends to 250sqm, and it is of insufficient size to accommodate a foodstore that will be able to deliver choice and competition. However, land adjacent to the A34 in Stone represents an available and suitable site to deliver a new Lidl foodstore to serve the shopping needs of existing and future residents and workers in the local area.



## MR G WILLARD LAND SOUTH OF STONE EMAIL RESPONSE – 21 APRIL 2020

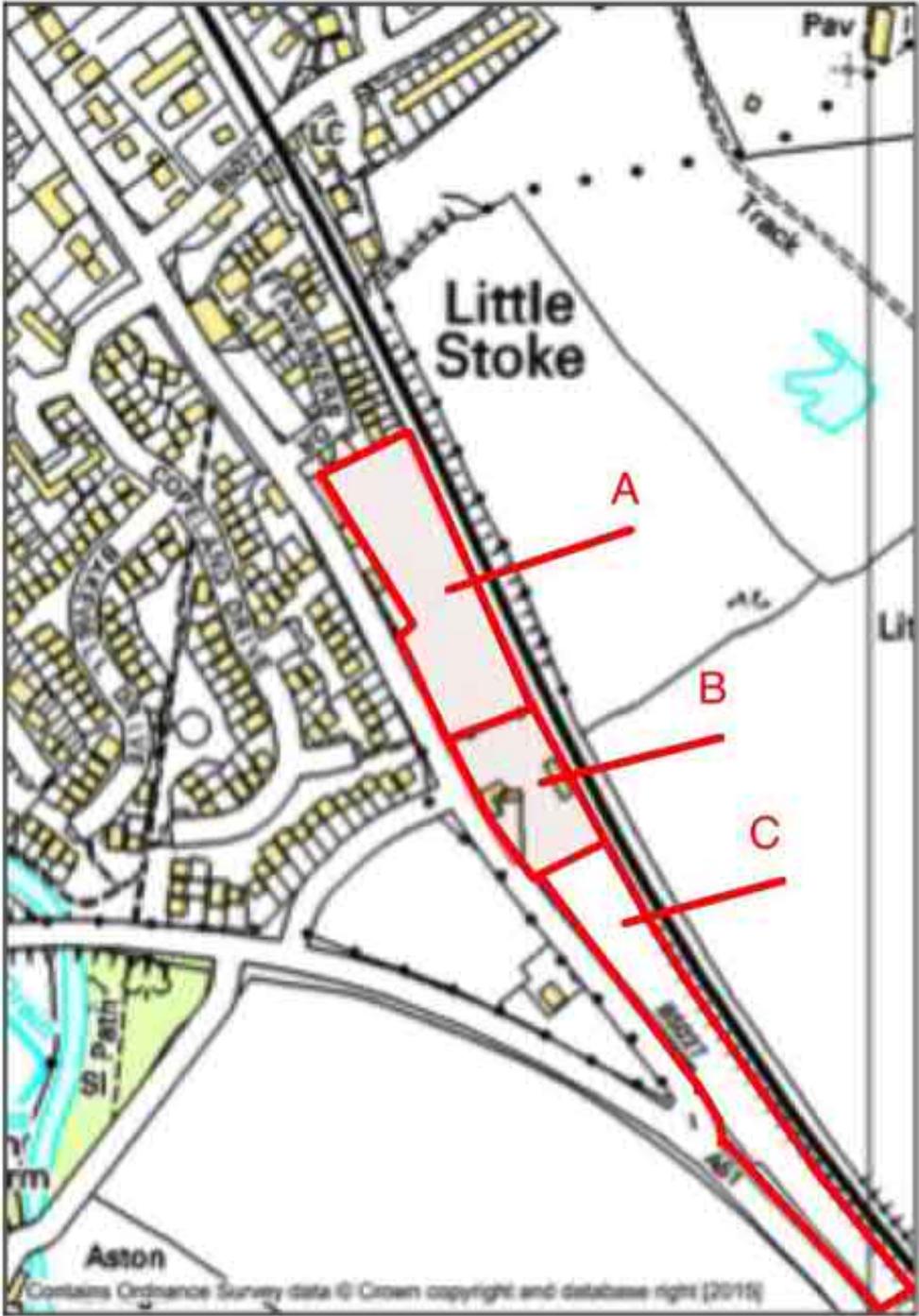
From: Gez Willard [REDACTED]  
Sent: 21 April 2020 10:58  
To: List-ForwardPlanning-SBC  
Subject: New Stafford Borough Local Plan 2020-2040. Issues and Options Consultation STONE SOUTH

Hello.

I attach a generic response to your recent consultation along with promotion of sites at Stone South.

Please confirm receipt.

Gez Willard



# Stafford Borough Local Plan 2020-2040

## Issues and Options Consultation Document February 2020

Response dated 20th April 2020

### Full list of Questions Section 1 – Introduction

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

The list is extensive

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

Yes. It will now be out of date because of COVID 19 which is changing the economic and political landscape.

### Section 3 Vision and Strategic Objectives

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

Yes of course it must. It makes no mention of emergency planning and a myriad of issues that dealing with a global pandemic might mean to the vision of the plan and its delivery. A whole panoply of change in society may follow such as increased and normalised home working, more home deliveries, need for local supply chains etc.... Some of these changes may be to provide short term emergency responses whilst others may be long term change brought about by the realities of living with a pandemic or one which may occur in the future.

3.B and 3.C Do you agree that the Vision should be shorter? 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?

Yes of course it must. It is much too verbose. The whole issues and options report is 183 pages long. It's preposterous.

Of course a plan must take a view on climate change.

3.D and 3.E Should the spatially-based approach to the Objectives be retained? Does this spatially-based approach lead to duplication?

Any planning policy document should only address matters within the ambit of LG control over planning matters. The shopping list of visions is more like a utopian wish list. Any meaningful plan must deal with matters it can affect but within the context of wider societal aims.

There is too much duplication and irrelevance.

3.E Is the overall number of Objectives about right?

No. Too many and too much duplication and irrelevance.

3.F Should there be additional Objectives to cover thematic issues? If so what should these themes be?

Are you kidding me. There is too much analysis paralysis in this process as it is.

#### Section 4 Sustainability and Climate Change

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?

This is laudable claim but one unlikely to get past Gvt scrutiny. Surely better to ensure officers trained to understand these matters, relevant techniques and be trained to encourage and promote their use.

b) What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?

Is this not the golden thread running thru all planning policy rational. It will be important to have a proper and open minded approach to these ambitions. Recent events are showing that home working can be helpful along with large gardens to allow people to work and exercise without leaving their homes. Research and empirical evidence and common sense assumptions can be examined to see if there is a place for larger low density housing in certain locations to allow homes which can serve as work places, gyms and shared multi-generational housing. This lower density living can have sustainable and emergency planning benefits.

4.B Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?

The private sector should be encouraged to provide for on site power generation and sustainable material use and planning policies and officers training targeted to give these matters due and proper weight.

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

This would be a good idea for all developments and not just large ones but only where compliant with national planning policy.

4.D Should the council allocate sites for wind energy developments in the Local Plan? If so, where should they be located?

No. it would be better to adopt general policy to this end or to avoid duplication to rely upon national government policy to give support where appropriate. The council should avoid being too prescriptive and stymieing innovation.

4.E Should the council implement a higher water standard than is specified in the statutory Building Regulations?

No.

## Section 5 The Development Strategy

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.

a) Local policy should not deviate from national policy and ought to be worded with sufficient flexibility to conform with possible future change in core national planning policy such as that relating to sustainable development.

b) Which decision is this one?

5.B

a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements?

a) To respond in a meaningful way is beyond my present professional knowledge and all I can offer is an insight from professional and personal life experience. It is clear that HS2, Brexit and now COVID 19 will change the social, economic and political

landscape of the area and it would be impossible to accurately predict the effects of these things and indeed other influences which may come to light during the plan period. It would seem to make more sense to me to see what the ecological, spatial and heritage carrying capacity of the area is and then to provide policy options based upon these things, national policy and local political aspirations.

For my part because it is a reality that many allocations will not come forward and to stimulate the market and support competition higher growth figures ought to prevail. In this case I would advocate Option F and 746 dpa.

b) Should a partial catch up rate allowance be incorporated?

Is it not possible to move forward with both figures and to say housing targets will be somewhere between them? The council is right to be nervous about slowing growth and being overly optimistic in making delivery projections. A minimum and maximum target may be a sensible compromise if Govt will sanction it. If not simply adopt a figure half way between the two figures.

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)?

As (b) above

5.D

1. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?  
2. Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

1) At present I do.

2) All settlements need to be looked at with regard to their potential. It would be dangerous to overlook all smaller settlements and to therein bring about slow attrition in these areas with declining services and ageing populations. The

planning process should remember the lessons of the County Durham communities abandoned by council policy in previous decades.

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?

The plan would be a failure if it did not.

5.F

a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed?

b) Are there any of these spatial scenarios that you feel we should avoid?

c) Which of these spatial scenarios (or a combination) do you consider is the best option?

a) Yes

b) The plan must look at all potentially viable policy options.

c) Growth Option G is supported because I seeks to spread growth including an allowance for smaller settlements.

It is simply not acceptable to leave out smaller settlements (tier 5 and 6) or they risk slow decay is at least an organic level of growth is supported. The council wisely appear to recognise this and their approach is supported.

The inclusion of the tier 3 settlements is a good idea too. Clearly much of the Northern part of the Borough is within the economic and functional orbit of North Staffordshire. The council ought to hold meaningful discussion with neighbouring council's to devise appropriate policy in these area having regard especially to the latent sustainable location of much of the North of the Borough.

Not specifically mentioned in this I&O paper are the tier 6 settlements of Hopton and Norton Bridge.

Hopton is an important small settlement because it serves two provide a range of lower density housing but within very close proximity to Stafford. It would be perfectly appropriate to make an allocation of land (especially brownfield land) and in

and around this village for low density multi generational housing with high levels of oil site powder generation and energy efficiency because of the need for such accommodation and to serve as an exemplar of such provision.

Norton Bridge is another settlement which has seen the loss of community facilities in recent years. The allocation of a housing site in this village which is accessible to Stone, Stafford and the likely location of a Garden Community would help to stimulate and invigorate this community.

In addition to this settlement boundaries and site allocations ought to go forward in 2 locations at Stone (South) and at Woodseaves

Stone South. The town has seen a number of large scale housing developments in recent years. This is in reflection of its higher settlement status and latent infrastructure. Room to expand further will be increasingly constrained by the need to prevent coalescence to the North with outlying North Staffordshire villages and to the South with Stafford. There are sites for logical rounding off of the settlement at Stone South adjacent to Lichfield Road. This part of the town is the Southern gateway into the town and it is very inauspicious at present - being dominated by a scrapyard. There is potential here for a small scale local shopping centre and starter homes/affordable housing along with specialist housing for older people in bungalows or a retirement community. The sites advanced have gained planning permission in the past and one site still has an extant planning permission. The scrapyard has no such consent but a residential allocation would represent a good opportunity to meet local needs and get rid of this brownfield bad neighbour use from the prominent location. These sites together form a logical rounding off of the southern entrance to Stone.

Woodseaves. This is a site promoted before and which remains available for a mixture of uses and subject to masterplanning. These uses could include pockets of housing, improved village centre. School car parking and open space and a new village football pitch.

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?

This plan cannot evolve much further in any meaningful way untried this matter is given full consideration and local, regional and national political backing. If this is not possible without too much delay and uncertainty it may be better to take the whole matter of the Garden Community and to deal with it as a stand-alone masterplan policy position to serve an overriding national and regional need.

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?

See the answer above but in summary:

- High growth is supported
- Spread of growth is supported
- New sites for low density multi generational and 'efficient' housing near to main towns is supported.
- Dealing with the Garden Community as a stand alone masterplan and policy matter is supported.
- Allocating some growth in tier 5 and 6 villages is supported.

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.

There is little point in pursuing policy which is not NPPF compliant as it will be unlikely to survive the rigours of policy examination and review.

Growth Options not considered by this document? If so, please explain your answer and define the growth option.

As above.

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?

It is considered to be too confusing and distracting to deal with the Garden Community within this plan. Better instead to deal with it in a stand alone policy document.

5.J What combination of the four factors:

Growth Option Scenario (A, D, E, F, G);

Growth option G is supported but with Garden Community dealt with outside of this plan.

Partial Catch Up

Comments made previously. Maybe adopt a minimum and maximum range.

Discount / No Discount

The council should adopt a robust method which is in accord with national policy and appeal precedence.

No Garden Community / Garden Community

Pursue a Garden Community but with a separate masterplan/policy framework at arms length too but at the same time as the replacement local plan

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?

No comment at this stage.

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.

No comment at this stage.

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?

No comment at this stage.

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.

No comment at this stage.

5.O 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

Yes,. See the attached sites at Hopton, Stone, Woodseaves and Norton Bridge

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.

No. It is too arbitrary. Development boundaries and development areas in adopted plans give clarity and certainty.

5.Q Do you agree with the methodology used to define settlement boundaries?  
If not please provide reasons for your response.

Already answered this question.

## Section 6 Delivering Economic Prosperity

Clearly this will need to be reviewed in the light of COVID 19 and the high probability of a recession at the time the plan is adopted and likely economic changes resultant from the fallout of the pandemic. It is likely to result in changes both to both the quantity of land needed and where and how it ought to be delivered. For this reason there is no further comment at this stage.

There may be existing areas of employment in rural areas especially sites that are no longer viable. The plan ought to look at their suitability for redevelopment for housing. This could include live/work housing or larger low density housing uses which allow for multi-generational living.

## Section 7 Delivering Town Centres that address Future Needs

No comment on this section

## Section 8 Delivering Housing

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

Yes it should indeed do that. This is in line with national policy and in addition to being the sustainable option is a good way to protect the countryside and Green Belt.

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: the implementation of a blanket density threshold; or a range of density thresholds reflective of the character of the local areas to be preferable? Why do you think this?

I do not agree with blanket density thresholds. I do agree that in most larger towns close to public transport routes that higher densities will be more sustainable and providing good housing solutions for younger people and small households. I do though also think that there is a place still for larger family housing sites, live/work sites and sites for multi generational housing. Standard housing can't provide for shared living between many family members or adequate working space. Housing solutions in the future can and should include much more variety including homes that provide shared garden space and space upon which to grow produce. There are significant societal benefits of supporting housing that provides for 2 or 3 generations of a family to live together. This ought not be overlooked. Housing which can accommodate dedicated office space to is needed. Sites for these kinds of houses will not be found or generally be appropriate in space hungry heart of towns but in outer urban areas and villages close to Stafford, Stone and the North Staffordshire conurbation clusters of low density housing sites could be appropriate.

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

It clearly will and the market will play a large part in this. The likes of Uber and Lyft have already changed public transport options with their 'ride' options and there

are also a range of vehicle sharing apps which promote vehicle sharing and people are primed to expect the development of driverless vehicles and drone deliveries. Broad based and flexible policies going forward will be needed.

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?

They are already material planning considerations. What is the point of the 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.

Policy must be applied across the board but with flexibility. There may be specific reasons why a conversion cannot meet policy provision for space but other planning gains mitigate in its favour. Legibility and vision is the essence of good long term plan making along with avoiding duplication or conflict with national planning policy.

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?

The council should leave these matters largely to the marketplace. This will be especially so in the societal transformation post the pandemic.

8.G Do you consider the lack of smaller housing units to be an issue within the Borough of Stafford? If so, are there any areas where this is a particular problem?

These are simple questions but with no simple or general answers. For many who look to downsize it is not just a matter of finding a smaller house. It comes often

alongside a desire to maintain the quality of life and outdoor space they had before but in a cheaper and more affordable smaller home. If homes have poor outlook and no space to park family vehicles or store a lifetimes treasures or do not have enough internal or garden to put up children and grandchildren they will not be attractive to down-sizers. Officers should speak to potential downsizers directly. They will see how desperately they seek suitable downsizing housing types.

In short quantity can be divorced from the matter of quality. To repeat the message from above increasing the provision of larger low density housing may actually prove to be more attractive to those wishing to downsize and share space with their own families. Planners tend to assume first build options are those that remain. In point of fact many larger Victorian villas across the UK have been

repurposed. No longer are upper floors and basements they preserve of maids and butlers but often younger flat users whom like quality interesting spaces. Larger low density housing can bring flexibility and be sustainable.

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

If that is what the evidential need is clearly is then it should.

8.1

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?

(a) Not necessarily bungalows as such but certainly lifetime homes. This said I am aware from recent client discussion that there is a growing demand for bungalows and that those that are being built are quickly being sold.

(b) A range of garden share and parking share options ought to be considered along with support for spaces to store caravans/motorhomes.

(c) Yes. Lifetime homes are needed in town and country.

(d) Yes. it needs to positively promote such housing.

8.J Do you consider that there is no need for additional provision of student accommodation within the Borough?

If that is what the market indicates. Recent events and home tutoring may lead to a huge shake out of the further education sector. As such care needs to be taken.

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?

a and b) The council MUST engage fully and properly with the social landlords to devise policy which is deliverable and clear. This MUST take account of market positions and sound property management. The council has moved to a 'cascade' preference in section 106 undertakings which is causing problems for social landlords who cannot afford 'void' spaces. Policy must be deliverable, realistic and financially viable.

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?

This need is understood however it will have a much better chance of increasing affordable rural housing to adopt a policy position that supports financial contributions. This would leave the LPA able to work with social landlords to deliver housing in a viable way in suitable locations.

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 council ought to first explain how this might be technically and legally possible.

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) 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 first thing the council should do is to talk to those who have self built or aspire to do so. It would be my view that those seeking self build plots are not looking to build on the back end of some volume builders site. In my experience self builders are looking for individual small plots to deliver their dream home in a dream setting.

A general policy of support for self and custom build houses of up to say 5 in number within or adjacent to settlement boundaries may be a better approach. Additional policy support could be given to those using proven designers, sustainable materials and creating on site energy and promoting local learning could be helpful to

The council should also give up the pretence that only those registered on the self build register are interested in such projects. People looking to self build do not necessarily look to register and those that have may only be a small portion of those with an interest. It would be better to contact self build and trade magazines to see how many subscribers live in the Borough and to seek the opinions of local estate agents as they are often the front line in land searches. Good information may also be gleaned from on line site and land search platforms.

## Section 9 Delivering Quality Development

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?

No comment

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?

In the same way that national policy does.....

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

In the same way that national policy does.....

9.D How should Plan Policies have regard to the new AONB Management Plan and Design Guidance?

Simply refer to its existence.

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?

Of course it wont. Policy should only relate to matters that are later subject to planning applications.

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.

This is an interesting area. However as the planning process cannot control in detail or for long the way open space is used in to the future policy needs to be wisely devised. I see it as a positive thing however to promote the setting aside of land to grow produce on.

As mentioned elsewhere the allocation of low density housing sites and land can help to bring this about.

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 it should.

9.H Do you consider there are areas in the Borough that should have the designation of Special Landscape Area?

No. Such a designation would require a costly and time consuming survey and landscape evaluation of the whole of the Borough. Better to spend this time and these resources on training planning officers on design and landscaping.

Section 9 Policy Theme and Questions

No comments at this stage

## Section 10 Environmental Quality

No comments at this stage

## Section 11 Health and Wellbeing

No comments at this stage

## Section 12 Connections

No comments at this stage

## General observations

This I and O paper means well but is is very poor for the following reasons:

- It is much too verbose
- It is too detailed
- It addresses matters that the planning process as presently set up has little hope of delivering.
- It is naive and simplistic

In the future policy making must become much quicker and flexible. By the time in depth analysis has concluded anything and produced policy the challenges have often changed.

The plan making approach that this plan suggests is much to broad in its scope.

It would be better to simply start by setting out those matters upon which the NPPF sets out policy already. It should then simply look to fill and plug gaps not set out in policy. This could simply be done by having a realistic and brief vision for the plan. Set out strategic policy and policies that will later guide the location of development.

Covid 19 has shown that where the situation demands even central government can take quick decisions. This has to be a certain result from the Covid 19 situation to inform plan making in the future. Be quick, light and flexible.



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Planning Department  
Stafford Borough Council,  
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[forwardplanning@staffordbc.gov.uk](mailto:forwardplanning@staffordbc.gov.uk)

April 2020

Dear Sir/madam

**Re: New Stafford Borough Local Plan 2020-2040. Issues and Options Consultation**

I have tried to respond fully to this document. It is the longest and most involved document of its kind I have seen. It is understood that it was written in good faith, to stimulate thought and with good intent. However there is far too much detail and rumination in here for public or even professional scrutiny at this stage in my opinion. It would perhaps have been better to aim to produce a much shorter report and to 'test' its usefulness before release.

Clearly Covid 19 is changing many aspects of life and procedures and policy making. It is though certainly reminding policy makers that policy needs to be flexible and quickly prepared. With respect this ought to be an aim of plan policy making. There is no point preparing a plan over 4 or 5 years which is out of date at the point it is released. Neither is there any point in dealing with policy matters already set out in national planning policy or which cannot be controlled by the present land use planning process.



Good luck with the next stage of the plan.

I attach to this submission 4 sites that I am promoting for development on behalf of clients thru this plan making process.

These are at Woodseaves, Stone(South) Hopton and Norton Bridge. I have set out in terms of issues and options these allocations or village boundaries that ought to be adopted in the future that would allow for and support development in these locations.

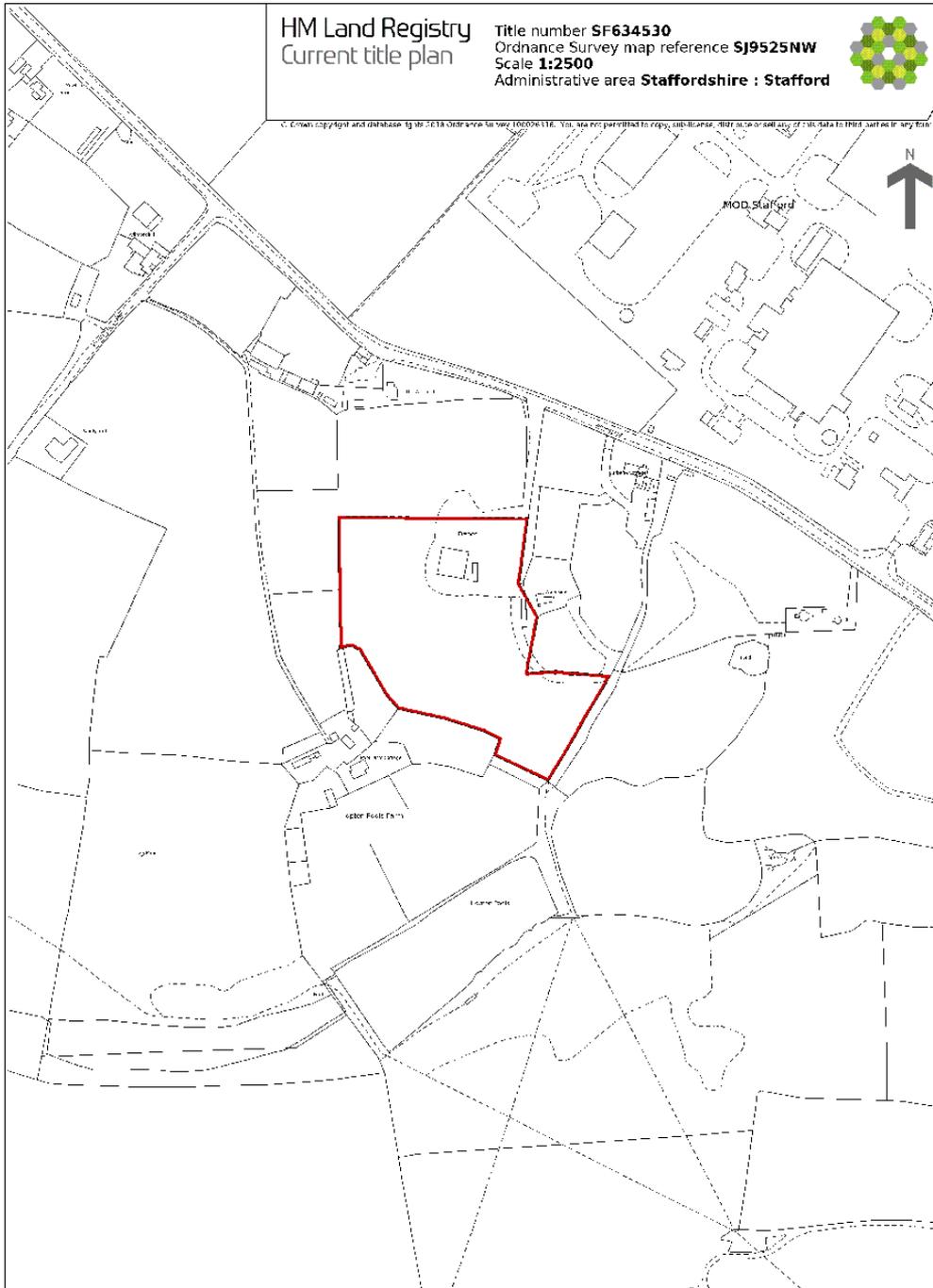
Yours Sincerely

Gerald Willard

Chartered Town and Country Planner.  
MRTPI

Hopton Site





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## MR G WILLARD EMAIL RESPONSE & WOODSEAVES MAP – 21 APRIL 2020

From: Gez Willard [REDACTED]  
Sent: 21 April 2020 11:00  
To: List-ForwardPlanning-SBC  
Subject: New Stafford Borough Local Plan 2020-2040. Issues and Options Consultation WOODSEAVES

Hello.

I attach a generic response to your recent consultation along with promotion of a site in Woodseaves.

Please confirm receipt.

Gez Willard

