

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

**Agents and
Developers -
Part 4**

3 February - 21 April 2020

Coding	Name:	Organisation:	Page Number
101	Bloor Homes (Midlands) - Land at Eccleshall Road, Stone.	Bloor Homes (Midlands)	1
102	Lovell Homes in respect of Land at The Crescent, Doxey	Lovell Homes	65
103	Richborough Estates (Land at Weston)	Richborough Estates	142
104	St Modwen Homes Ltd.	St Modwen Homes Ltd.	198
105	Legal & General Property	Legal & General Property	214
106	Bellway Homes - Land between Main Road and A51, Little Haywood	Bellway Homes	223
107	Ms Joanne Russell	Stoford Developments	274
108	Rentplus UK Ltd	Rentplus UK Ltd	285
109	McCarthy & Stone Retirement and Churchill Retirement Living	McCarthy & Stone Retirement and Churchill Retirement Living	321
110	Vistry Homes Limited	Vistry Homes Limited	324
111	Bellway Homes Ltd and John Alison Land & Research - Land south of B5026 Stone Road, East of Eccleshall	Bellway Homes Ltd and John Alison Land & Research	351
112	Ms N Wassall	Ms N Wassall	373
113	Matthew Weaver – land to the south west of Stone Business Park	Hinson Parry and Co	378

STAFFORD BOROUGH LOCAL PLAN 2020-2040

ISSUES & OPTIONS (JANUARY 2020)

LAND AT ECCLESHALL ROAD, STONE

ON BEHALF OF BLOOR HOMES



**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Pegasus Group



Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester
PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	CONTEXT	3
3.	EVIDENCE	4
4.	VISION & STRATEGIC OBJECTIVES	5
5.	SUSTAINABILITY & CLIMATE CHANGE	7
6.	THE DEVELOPMENT STRATEGY	9
7.	DELIVERING HOUSING	19
8.	DELIVERING QUALITY DEVELOPMENT	27
9.	ENVIRONMENTAL QUALITY	33
10.	LAND AT ECCLESHALL ROAD, STONE	35
11.	CONCLUSION	38

APPENDICES:

APPENDIX 1: SITE LOCATION PLAN

APPENDIX 2: PROMOTIONAL DOCUMENT

1. INTRODUCTION

1.1 These representations are made by Pegasus Group, on behalf of Bloor Homes, in response to the Stafford Borough Local Plan Review (2020 – 2040) 'Issues and Options Consultation Document February 2020.' This representation relates to land at Eccleshall Lane, Stone which is within the control of Bloor Homes. These representations should be read alongside the accompanying:

- Site Location Plan (**Appendix 1**)
- Promotional Document (**Appendix 2**)

1.2 Evidence is provided, in association with these representations to support the allocation of land at Eccleshall Road, Stone. This evidence is in the form of a Promotional Document (**Appendix 2**) which provides information about the specifics of the site and a potential development scheme. The Promotional Document draws on technical assessments and introduces an Indicative Masterplan showing how the site could be developed. The site-specific information provided demonstrates that the site is suitable, developable and deliverable and that it would be sound to identify the site as part of the Local Plan Review process. The information contained within the Promotional Document demonstrates that land at Eccleshall Road, Stone can deliver in the order of 600 dwellings.

1.3 These representations respond to the 'Issues and Options' consultation document and accompanying published evidence, having regard to the national and local policy context. Where appropriate, Bloor Homes provides a response to the specific questions set out within this document.

1.4 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:

- a) **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;

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- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.5 The representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2. CONTEXT

- 2.1 Bloor Homes supports Stafford Borough Council's decision to commit to a review of the adopted Stafford Borough Local Plan. This provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 2.2 The most recent National Planning Policy Framework (NPPF) (February 2019) requires local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years. The proposed timescales, as set out within the Local Development Scheme, will ensure that an up to date Local Plan for the Borough will be in place to support growth and meet future development needs.
- 2.3 The Local Plan Review is necessary in order to respond to the need for continued growth within the Borough to 2040 and to ensure consistency with national policy and guidance.
- 2.4 The Issues and Options consultation follows previous Issues consultation, which scoped issues that affect the Borough, and looked at options for addressing them. The Issues document also set out a proposed new settlement hierarchy that had regard to the Settlement Assessment. The current consultation document utilises the response to the previous consultation to further explore the vision and strategic objectives to 2040 and highlights a range of growth and spatial strategy options for delivering growth within the Borough.
- 2.5 Bloor Homes supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up to date policy framework exists within the Borough to guide growth to 2040 and to ensure that development is genuinely plan led.

3. EVIDENCE

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

- 3.1 The list of assessments and studies identified within the consultation document represents a suitable list, however it should be recognised that this evidence should be refreshed throughout the review process where necessary to reflect changing circumstances or guidance. In addition, Bloor Homes recognises that elements of the evidence base will need to be iterative with the emerging growth requirements and spatial distribution of growth.

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

- 3.2 Paragraph 1.10 makes reference to an 'Infrastructure Delivery Programme' which is assumed to represent an Infrastructure Delivery Plan identifying the necessary infrastructure to support new development. Again, it is recognised that this will be refined at each stage of the plan making process being intrinsically linked to any preferred spatial strategy and the outcome of discussions through the Duty to Cooperate.

4. VISION & STRATEGIC OBJECTIVES

- 4.1 It is noted that the adopted Local Plan contains a detailed Vision and a significant number of Key Objectives. Both the Vision and Key Objectives contain a number of spatially specific elements i.e. Stafford, Stone or lower tier settlement specific elements. Bloor Homes considers it is necessary to review this approach.

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

- 4.2 Bloor Homes considers that the Vision contained within the adopted Local Plan is overly protracted and fails to clearly and succinctly set out a comprehensive vision for the Borough.
- 4.3 The Local Plan Review process provides a perfect opportunity to distil the current Vision into a locally relevant, yet Borough-wide Vision that clearly aligns to the spatial change sought in Stafford Borough to 2040.

Question 3.B: Do you agree that the Vision should be shorter?

- 4.4 Bloor Homes agrees the Vision should be shorter as set out above. This could be achieved through the removal of the sub-sections for both Stafford and Stone which would sit more usefully within a Neighbourhood Plan to be defined and refined by local communities.

Question 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?

- 4.5 The 'Scoping the Issues' consultation summary contained within the current consultation document identified the support for renewable energy sources and the future proofing of new development via the use of technology as reoccurring or key responses.
- 4.6 It is recognised that Stafford Borough Council has declared a 'climate emergency' and has committed to preparing a report to set out how the Council proposes to respond. The implications of climate change for emerging policy to be contained within a new Local Plan should be informed by the Council's Climate Change Strategy/Report currently in preparation. Bloor Homes considers that any recognition of Climate Change to be incorporated within the Vision should await the outcome of the Council's corporate stance on climate change.

Question 3.D: Should the spatially-based approach to the objectives be retained? Does this spatially-based approach lead to duplication?

4.7 Bloor Homes considers the 28 key objectives contained within the adopted Local Plan to be protracted and repetitive. This is, in part, due to the spatially-based approach taken by the Borough Council previously.

4.8 In line with comments in respect of the Vision, Bloor Homes consider that the review provides an opportunity to distil elements of the current objectives that remain relevant to the Borough, into a concise set of Borough-wide objectives.

Question 3.E: Is the overall number of objectives about right?

4.9 Bloor Homes considers the list of current objectives is far too long. A shorter list of succinct, locally relevant Borough-wide objectives would provide greater clarity and understanding of the most important areas of change or protection within the Borough.

Question 3.F: Should there be additional objectives to cover thematic issues? If so what should these themes be?

4.10 Bloor Homes does not support the preparation of additional objectives, but reconsideration of the existing objectives. Updated objectives should include:

- Approach to spatial distribution of growth to support sustainable communities
- Meeting housing needs
- Economic growth requirements
- Infrastructure delivery
- Range of locally relevant thematic topics that would include climate change, centres, leisure, heritage, ecology, landscape and the creation of high-quality new development.

5. SUSTAINABILITY & CLIMATE CHANGE

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. 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? What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the Borough?

- 5.1 Whilst it is commendable to deliver enhanced energy efficiency as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.

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?

- 5.2 Whilst it is commendable to deliver renewable and low carbon energy as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.

- 5.3 The ability for large developments to source a certain percentage of their energy supply from on-site renewables will need to be balanced with the burden of delivering other infrastructure requirements that will be required to support the chosen spatial strategy to ensure the delivery of sustainable communities.

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

- 5.4 Whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such

requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. 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 PPG. This evidence does not appear to be present.

- 5.5 The policy approach should be informed by a Water Cycle Study to determine whether the scale, location and timing of planned development within the Borough would give rise to issues from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.

6. The Development Strategy

- 6.1 Bloor Homes supports the review of the spatial development strategy to establish the scale and distribution of new housing and employment development to 2040.

Question 5.A: Do you consider that the existing Policy SP1 addresses the requirements of the NPPF? Do you consider that it is necessary to retain this policy in light of the recent changes in Planning Inspectorate's view?

- 6.2 Policy SP1 contained within the existing Plan for Stafford Borough broadly addresses the requirements of the NPPF. It is considered appropriate to retain a policy committing the Council to applying the presumption of sustainable development within any new Plan for the Borough to 2040. The continuation of such a policy is therefore recommended by Bloor Homes.

Question 5.B: 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? Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

- 6.3 The preparation of the EDHNA is noted by Bloor Homes. The approach taken in the EDHNA to consider a range of scenarios and accelerated headship rates is supported, particularly in respect of the consideration of balancing housing delivery with economic growth likely to be experienced and supported through the aspirations of the Borough.
- 6.4 Scenario A, which represents the Standard Method, relies on the Sub-National Household Projections (SNHPs) which draws from past trends.
- 6.5 The Government confirms the use of the 2014 SNHPs to provide the demographic baseline for the assessment of housing need in the short term and the Government's intention to review the formula and consider amending the method in the longer term. The baseline figure represents a minimum figure and does not account for additional housing demand that may arise as a direct result of economic growth during the plan period. Furthermore, it does not include meeting housing needs arising from neighbouring authorities.
- 6.6 It represents a position that does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour, including meeting cross-boundary needs. Bloor Homes

therefore does not consider that this represents the most appropriate annual housing requirement for Stafford Borough.

- 6.7 Scenario's B and C represent a housing requirement that is lower than the Standard Method. There are no exceptional circumstances that can be demonstrated in Stafford Borough to justify an annual housing requirement below the Standard Method. Bloor Homes therefore consider it is appropriate for these two scenarios to be discounted based on the evidence provided within the EDHNA.
- 6.8 Scenarios D, E, F and G apply different jobs growth assumptions. The EDHNA recognises that the *"jobs projections, modelled in PopGroup, suggest that there would have to be an uplift to the demographic baseline if the employment growth /policy-on forecasts are to be realised, ranging from 435 dpa (Scenario D CE Economic Forecasts) to 683 dpa (Scenario F Past Trends Jobs Growth). These equate to between 489 dpa and 746 dpa incorporating PCU rates."* Options D to G are the only options to require a level of housing growth similar or higher than the those set out in the current Plan for Stafford Borough.
- 6.9 Bloor Homes agrees there is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment. In addition, if the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing. Jobs growth and housing growth are intrinsically linked and should be balanced to ensure a sustainable strategy to 2040.
- 6.10 Scenario D utilises the CE Baseline and represents a level of jobs growth that is significantly lower than past trends in jobs growth in the Borough and does not reflect the Council's future growth aspirations. Bloor Homes consider that this should therefore be discounted.
- 6.11 Scenario E assumes the delivery of a new Garden Community which would attract £750k of Government funding to develop detailed plans for key infrastructure such as highway improvements, schools, water and energy provision. It also assumes delivery of a major development proposal at Stafford Station. In total these proposals are assumed to create an additional 12,500 new jobs in the Borough. If both a Garden Community and the Stafford Station Gateway projects are pursued it is considered appropriate to utilise this scenario as an absolute minimum to guide

the housing requirement as jobs growth should also be supported beyond any Garden Community and individual proposals within the county town of Stafford.

- 6.12 Scenario F reflects the jobs growth that has been experienced within Stafford Borough in the past (2000 to 2018). The EDHNA concludes that *"it is considered, given the current economic climate, that this rate of jobs growth is unlikely and would not be able to be sustained over the Plan Period. It is recognised that the current period is one of considerable economic uncertainty, in part as a result of Brexit, and that this may change, leading to more favourable economic conditions."* Bloor Homes would disagree with this conclusion on the basis that past jobs growth included a significant period of economic uncertainty, namely a prolonged recession, and fails to take account of the 12,500 additional jobs that could be created through the Stafford Station Gateway and a new Garden Community contained within Scenario E. The Local Plan will cover a period of at least 15 years from adoption and therefore should cover any cyclical changes in the economy.
- 6.13 Scenario G (CE Baseline + 50% scenario) considers an intermediate level of jobs growth between Scenario D and Scenario F, *"reflective of jobs growth associated with the development of Stafford Station Gateway but not including jobs associated with a potential New Garden Community development."* This scenario appears arbitrary in assuming that the Council's economic growth aspirations will not be met without a Garden Community and that any growth over and above the baseline would only be attributable to Stafford Station Gateway. Bloor Homes considers this approach to be flawed.
- 6.14 Bloor Homes considers that the most appropriate Scenarios are Scenario E and F. Scenario E should be utilised as an absolute minimum if a Garden Community proposal were to be pursued. In addition, Bloor Homes considers that a level of economic growth that reflects past trends jobs growth is achievable over the plan period. This is reflected in Scenario F.
- 6.15 Bloor Homes would also support the inclusion of partial catch-up rates in respect of headship rates, to ensure that household formation rates suppressed in the past are rebalanced looking to the future.

Question 5.C: In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid 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 explain your reasoning.

- 6.16 The Housing Requirement figure for the New Local Plan should be expressed as a total figure without discount as the New Local Plan will replace the current Plan for Stafford Borough.
- 6.17 It is logical that existing uncommitted allocations or other sites relied upon to deliver homes by 2031 may contribute to this housing requirement. However, any existing site that is to be relied upon should be subject to the same scrutiny and assessment as any other 'reasonable option' being promoted through the Local Plan Review process. Any site deemed to be available, suitable and achievable and determined to be deliverable or developable should then inform a Borough wide trajectory for the period 2020-2040 and be carried forward through allocations within the new Local Plan.
- 6.18 Through the Local Plan Review it is considered essential to review all sources of housing supply, including existing commitments. Whilst it is recognised that the Plan for Stafford Borough was only completed in 2017, further information or evidence may have arisen since adoption that raises questions of suitability or delivery of sites allocated.
- 6.19 All potential sources of supply should be scrutinised through the Local Plan Examination in Public, especially non-allocated windfall sites, and it is recommended that a site-specific housing trajectory is prepared to support the Preferred Options consultation. This should provide delivery assumptions in respect of any proposed preferred option allocation i.e. build out rates and lead in times.
- 6.20 If sites currently relied upon for delivery prior to 2031 no longer represent a deliverable or developable proposition or there are more appropriate alternatives in line with a new spatial development strategy, they should be removed from the supply and the emerging Local Plan as appropriate.
- 6.21 Bloor Homes consider that it is highly unlikely that a future supply of 6,000 homes can be demonstrated in Stafford Borough to 2031 through existing planning commitments and uncommitted allocations.

Question 5.D: Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy? Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

- 6.22 Bloor Homes supports the emerging Settlement Hierarchy which identifies Stone as a Tier 2 settlement, second only to Stafford. This reflects Stone's position as the second largest settlement within the Borough and the sustainability credentials of the town.
- 6.23 Bloor Homes has no particular view in respect of including the Tier 6 'Smaller Settlements' however, inclusion within the settlement hierarchy should not in itself result in such settlements being afforded growth requirements through a spatial development strategy. Development growth should be focused to the most sustainable settlements within the Borough.

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?

- 6.24 Again, whilst Bloor Homes has no particular view on whether built-up areas to the north of the Borough should be included within the settlement hierarchy, inclusion in itself, should not determine whether these areas should form part of the spatial development strategy for delivering growth. Development within this area should have regard to any cross-boundary requirements related to Stoke-on-Trent and Newcastle-under-Lyme in particular and recognise there are non-Green Belt opportunities in other sustainable locations such as Stone.

Question 5.F: In respect of these potential scenarios do you consider that all reasonable options have been proposed? If not, what alternatives would you suggest? Are there any of these spatial scenarios that you feel we should avoid? If so, why? Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer.

- 6.25 Bloor Homes considers that all reasonable potential spatial scenarios have been identified, however it is recognised that some of these options are not mutually exclusive. In addition, it is considered that the Garden Communities scenario and Intensification of Town and District Centres are not appropriate to be pursued in isolation.
- 6.26 It is important that a range of sites across a wide geographical area would provide greater certainty for delivery. Bloor Homes considers that the spatial distribution

of growth should be driven primarily by sustainability and the existing settlement hierarchy where possible support the creation of sustainable communities. Bloor Homes would therefore recommend the inclusion of sustainable extensions to larger settlements as a primary driver of growth, including within Stone.

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

- 6.27 The NPPF recognises that planning for larger scale developments such as new settlements or significant extensions to existing towns may be the best way to achieve future supply, provided it is well designed, located and provided with the necessary infrastructure and facilities.
- 6.28 However, there are a number of disbenefits associated with the seven options identified by the Council, particularly in respect of deliverability.
- 6.29 Modest urban extensions (up to approx. 1,500 new homes) to existing top tier settlements have the benefit of making best use of existing infrastructure present. Whilst Bloor Homes recognises that further infrastructure will be required to support the delivery of modest extensions to mitigate any impacts, a new settlement/significant extension of the scale proposed by the seven options would require the delivery of all significant new infrastructure, delivered in a timely manner, to ensure a level of self-containment and sustainability. The Greater Birmingham HMA Strategic Growth Study sets out a number of social and community infrastructure assumptions for new towns/settlements which may be relevant to Stafford Borough, as follows:
- *"mixed-tenure home and housing types;*
 - *employment land provision sufficient to meet aspiration of self-containment;*
 - *include integrated health care practice or practices;*
 - *include provision of primary school(s) and secondary school;*

- *include provision of local centres to meet everyday convenience shopping needs and provision of 'town centre' incorporating a range of comparison and convenience stores;*
- *provide facilities for community/cultural activities;*
- *uses zero-carbon and energy-positive technologies;*
- *provide coordinated recreational and sporting facilities (including a swimming pool) that meet the needs of the development;*
- *delivery of comprehensive green infrastructure within the new settlement."*

6.30 All of the seven options relate to lower tier settlements or rural locations that cannot make best use of existing infrastructure. Pursuing development in these locations would require the reliance on external grant funding to demonstrate deliverability and would need to be rigorously tested through a viability assessment prepared as part of the plan-making process.

6.31 It is also questioned whether a number of the options identified would result in the creation of sustainable communities. For example, it is unlikely that options resulting in less than 5,000 homes would be capable of supporting the provision of a secondary school leading to unsustainable travel patterns.

6.32 In addition, reliance on such significant options would result in long lead in times of a minimum of 5-10 years and increased uncertainty related to delivery assumptions due to potential market saturation. The number of homes that could be delivered in any location will be finite and Bloor Homes consider that the larger options would result in build-out periods that stretch way beyond the end of the Plan period in 2040. Bloor Homes would wish to raise concerns that the Council is assuming the delivery of 500dpa from this source in some scenarios identified in later years of the plan period to 2040.

Question 5.H: Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community/Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)? If you do not agree, what is your reasoning? 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.

- 6.33 Bloor Homes considers that Growth Options 1 and 2 could be compliant with the NPPF where development in the smaller villages is supported through the preparation of Neighbourhood Plans, which would also form part of the development plan for an area.
- 6.34 Options 1 and 2 would ensure development is focused to the most sustainable locations within the Borough, including Stone, and would result in new development being able to make best use of existing infrastructure available. Option 2 would also allow for a range of sites to be identified within the Local Plan across a wide geographical area. This would be further increased through the support of local communities in the preparation of Neighbourhood Development Plans where local, organic growth would be supported.
- 6.35 Option 3 would disperse development to smaller settlements that do not contain the level of services and facilities necessary to support sustainable travel patterns and communities. Bloor Homes consider that these less sustainable settlements should not be relied upon to deliver the Borough's growth requirements, but such communities should be allowed to support local growth through the provision of Neighbourhood Development Plans.
- 6.36 Option 5 replicates Option 3 with the additional inclusion of a new Garden Community. Bloor Homes consider that development should not be relied upon within the smaller, less sustainable settlements and that a cautious approach should be taken in respect of the delivery of a Garden Community/Significant Extension for the reasons outlined above.
- 6.37 Option 6 seeks to maximise the benefit of the existing transport network and other infrastructure however, Bloor Homes agree that this is likely to lead to undesirable ribbon development. If this Option were to be pursued, it would be necessary to ensure that development is still focused to the most sustainable settlements within the Borough along these identified corridors.
- 6.38 Bloor Homes consider the most appropriate and balanced approach to distributing growth to be an amended Option 2 to allow additional growth in smaller settlements where this is supported by a local community through the progression of a

Neighbourhood Development Plan. It is considered that this approach would comply with the NPPF.

Question 5.I: Do you think that it is appropriate, in order to take the development pressures 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.

6.39 With regard to the delivery of at least one Garden Community, Bloor Homes considers this would have a number of disbenefits including requiring significant investment in new infrastructure, relying on long lead in times of a minimum of 5-10 years and increased uncertainty related to delivery assumptions due to potential market saturation. Therefore, it is contended that any proposed spatial strategy should not be heavily reliant upon the delivery of new Garden Communities. With reference to our comments set out above in respect of the housing requirement scenarios, and the potential for the Borough to accommodate increased housing numbers to 2040, it is clear that there is scope for a wide range of sites geographically spread across the Borough in accordance with the settlement hierarchy, without the need to rely on the possible inclusion of a Garden Community.

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

- 1. Growth Options Scenario (A, D, E, F, G)**
- 2. Partial Catch Up**
- 3. Discount/No discount**
- 4. No Garden Community/Major Urban Extension**

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

6.40 In light of the economic growth aspirations of the Borough and the affordable housing need, Bloor Homes considers Growth Option Scenario F is the most appropriate option.

6.41 Bloor Homes supports the approach to partial catch-up in respect of headship rates to ensure past household suppression is not forecast into the future.

6.42 Bloor Homes recognises that a committed supply of housing land will play a role in meeting the housing requirement between 2020 and 2040, however it will be necessary for the Council to ensure robust scrutiny of this supply and subject any uncommitted housing allocation to the same assessment as alternative site options through the plan-making process.

6.43 Bloor Homes does not consider it is necessary for the Council to rely on the delivery of a new Garden Community to meet an appropriate housing requirement for the Borough. If a Garden Community is incorporated within the spatial development strategy further flexibility should be provided within the planned supply to take account of the increased risks of delivery. Delivery assumptions should be realistic.

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.

6.44 Bloor Homes agrees with an assumption being incorporated within the EDHNA to take account of future losses of employment land.

Question 5.M: Should the New Plan broadly mirror the spatial distribution of new employment prescribed by the current Plan? If not, what would you suggest and on what basis?

6.45 Bloor Homes consider housing growth and jobs growth are intrinsically linked. To ensure balanced and sustainable communities, housing growth should be focused to locations where job opportunities are present, having regard to not only planned employment allocation, but existing employment generating uses. This is likely to be reflected by the proposed settlement hierarchy where Stone is identified as a Tier 2 town.

Question 5.O: Are there any 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.

6.46 Bloor Homes has submitted information in respect of land at Eccleshall Road, Stone through the "Call for Sites" process.

7. DELIVERING HOUSING

7.1 Section 8 of the consultation document considers housing delivery, recognising that the provision of a housing market which reflects the needs of all members of the community is a key objective of plan making.

7.2 Bloor Homes seeks to raise a number of views in respect of housing delivery which are intended to be helpful in guiding policy.

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

7.3 Whilst the NPPF at paragraph 117 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 or ‘brownfield’ land*” it does not require a brownfield first policy. The plan-making process must recognise the importance of identifying greenfield sites to ensure an appropriate housing requirement can be met within the Plan period and to ensure the Local Plan is deliverable. This is highlighted by the Council’s Brownfield Register which identifies brownfield sites that could yield approximately 800 dwellings, noting that these are all consented.

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

7.4 Bloor Homes supports the efficient use of land, in accordance with National Planning Policy and Guidance, however, the introduction of a Borough-wide minimum density standard is not supported. Instead, it is necessary for sites to be considered on a site-by-site basis, having regard to the prevailing housing market conditions, local character, context and other planning policy requirements or environmental designations or constraints.

7.5 In accordance with national guidance the Council may wish to consider a variety of density standards for different locations.

7.6 Nevertheless, due to the size of the site at Eccleshall Road, Stone and the lack of identified constraints, it is realistic to expect the delivery of an efficient scheme

that could achieve a minimum average net density of 37-40dph. However, this would be achieved through the provision of character areas of varying density and would be reflective of the character of surrounding development, including committed development currently under construction to the east of the site, within the current housing allocation.

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?

7.7 Please see response 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?**

7.8 Bloor Homes maintain a position that the acceptability of dwelling design and provision of external spaces should be considered on a site-by-site basis.

7.9 The NDSS was published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.

7.10 In introducing the standards, the Written Ministerial Statement outlines:

"New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes."

- 7.11 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

"From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy."

- 7.12 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

"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 National Planning Policy Framework and Planning Guidance."

- 7.13 The reference to the National Planning Policy Framework relates to paragraph 174 which states:

"Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence."

- 7.14 The reference to the National Planning Guidance relates to the following:

"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”*

7.15 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability. If the Council were to consider introducing such a requirement, further evidence is necessary.

7.16 Regarding need, no justification or evidence is provided and until it is the NDSS should not be applied to any site on the premise it would be unsound. Bloor Homes consider there is unlikely to be any local circumstances within Stafford Borough that would support such an imposition of the Nationally Described Space Standards (NDSS).

7.17 Regarding viability, there is an intrinsic link between the affordability of a property and its size (in floorspace) typically expressed as a cost (£) per square metre (or square foot). Should the NDSS be implemented within Stafford Borough, the building costs would increase, and these additional costs would be offset by the increase in market value, estimated to be in the order of 10%.

7.18 Therefore, artificially increasing the floor area of properties to achieve NDSS standards would serve the purpose of ‘pricing out’ a number of potential purchasers that have a current housing need. This is despite local evidence justifying a significant affordability issue being present within the Borough.

7.19 The imposition of NDSS should not be required on any site unless it is further justified on grounds of viability.

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?

7.20 Bloor Homes considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan period. This ensures that housing mix is reflective of market-driven need.

7.21 Bloor Homes does however recognise the recommended range provides a good level of flexibility to allow for changing market signals across the Plan period and in different locations within the Borough. It is therefore considered sufficient in terms of ensuring the needs of all members of the community can be met.

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?

7.22 Bloor Homes considers the existing housing stock within Stone to be balanced however recognises the current demand for smaller 2 and 3 bed properties across the Borough.

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

7.23 If the Council wishes to adopt the higher optional standards for Part M Category 2 and 3 then this should only be done in accordance with the NPPF (paragraph 127f & Footnote 46). The Written Ministerial Statement (WMS) dated 25th March 2015 stated 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."* Bloor Homes considers that such an approach has not been justified by the evidence base available at present.

Question 8.I: 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? Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens? Is

**there a need for bungalows to be delivered in both urban and rural areas?
Are there any other measures the Council should employ to meet the
demand for specialist housing within the Borough of Stafford?**

- 7.24 It is considered that the need to deliver specialist housing, including bungalows, should be guided by demand and market signals, through an up-to-date evidence base. It would be inappropriate to impose a Borough-wide percentage provision for bungalows, the demand for which varies geographically.
- 7.25 If bungalows are to be provided within a scheme, it would seem logical to reduce garden sizes or allow for the provision of communal/shared gardens to ensure efficient use of land and to reflect any desire from the market for low-maintenance external amenity areas. This approach is also likely to align to any appropriate space about dwellings requirements which should reduce the necessary distance between principal facing windows for ground floor windows, where intervening boundary treatments would interrupt views.

**Question 8.J: Do you consider that there is no need for additional provision
of student accommodation within the Borough?**

- 7.26 Bloor Homes has no view on whether additional provision for student accommodation is required, however, any provision should not contribute towards the annual housing requirement.

**Question 8.K: Do you consider an affordable housing provision of between
252 and 389 units per annum to be achievable? 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?**

- 7.27 The level of affordable housing provision that is achievable will be intrinsically linked to the annual housing requirement established through the Local Plan review and overall plan viability having regard to all other policy requirements sought.
- 7.28 Utilising the highest annual requirement of 746 dwellings per annum set out in Scenario F, the affordable housing requirement would represent between 34% and 52% of all homes delivered. Based upon the annual housing requirements set out through the EDHNA, Bloor Homes consider that an affordable housing provision of 389 per annum is unachievable. It is also relevant that the highest level of annual affordable homes delivered within the Borough through the current Plan period

equated to 343 dwellings in 2016/17 based on a total of 1,010 dwellings (34% of all completions).

- 7.29 Bloor Homes is of the opinion that a target of 252 affordable homes per annum is only like to be achievable if a housing requirement in line with Scenario F, as a minimum, is pursued. This would require a continuation of an affordable housing requirement of between 30% and 40% on qualifying sites and this would need to be balanced with other policy requests through an assessment of viability.

Question 8.M: In order to help maintain the potential supply of land for rural affordable housing should the Council, where development has not yet commenced, convert existing Rural Exception Site Planning Permissions to Rural Affordable Housing Site Allocations?

- 7.30 The NPPF defines Rural Exception Sites as "*small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.*" As these sites represent sites that would not normally be used for housing, in the large part due to the sustainability of locations, and represent sites that should not be relied upon in meeting the overall housing requirement, Bloor Homes consider an approach to convert these permissions to site allocations through the Local Plan to be unsound. The suitability and deliverability of these unimplemented permissions should be subject to the same level of scrutiny and assessment as all other reasonable sites contained within the SHELAA, having regard to the spatial development strategy.

Question 8.N: 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? Should the Council allocate plots for the purpose of self-build throughout the Borough?

- 7.31 In terms of the requirement for all major housing development proposals to provide evidence that they have fully considered the provision of self/ custom build within the overall housing mix on site, from an urban design/ masterplanning perspective, the integration of a number of self builds into a scheme being delivered by a volume housebuilder (that often work on standard house types) would possibly be difficult to achieve in respect of both making an efficient use of land; and to achieve design

consistency. Further, sites currently being put forward by developers have been negotiated on the basis of existing planning policies and values and such an addition could impact on viability. It is recommended that further work be commissioned in order to find out where households would like to have the opportunity to undertake a self and custom build, so that the planning policies can better provide for the need rather than simply asking developers of all large sites to offer land.

- 7.32 In addition, the Council's own evidence base does not appear to fully justify a need for self/custom build properties to be considered on all sites over 100 dwellings. In October 2019 only 45 people had registered. This evidence does not support the Council's suggested approach.
- 7.33 A key priority of the Government is to boost the supply of housing by a variety of means to meet the varied housing needs of people across the UK. Self-build and custom housebuilding have been identified as a significant element of the Government's agenda to increase housing supply. The NPPF gives explicit support to policies which would plan for a mix of housing based on the needs of different groups in the community, including people wishing to commission or build their own homes. In addition, paragraph 61 of the NPPF sets out that Local Planning Authorities (LPAs) have a duty to assess the local demand for self-build plots and must also make provision for that demand.
- 7.34 With regard to facilitating the provision of self-build and custom build housing within Stafford Borough, the identification of specific sites for such development is favoured, as this option would have a greater chance of ensuring that the needs of local people wishing to build their own homes are met. It is recommended that these sites are specifically allocated as self-build/custom build housing sites within the Local Plan Review document.

8. DELIVERING QUALITY DEVELOPMENT

- 8.1 Section 9 of the consultation document relates to the quality of development. Bloor Homes seeks to provide views in respect of blue and green infrastructure, landscape and general design guidance.

Question 9.A: Should the Council have a separate policy that addresses Green and Blue Infrastructure? Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?

- 8.2 The importance of green and blue infrastructure is, unquestionably, important in delivering good design and ensuring that it reaches beyond the site linking to areas beyond. However, caution should be exercised in being too prescriptive as sites and their contexts will vary. Notwithstanding this, it is important that opportunities for linkages are maximised and clearly articulated, through an evidence-based approach which is then clearly shown on a policies map to provide certainty.

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 team?

- 8.3 Policies must be prepared in conformity with the NPPF, paragraph 174 which states that plans should:
- A. identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation and;
 - B. promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Question 9.C: Should the new Local Plan continue to protect all designated sites from development, including maintaining a buffer zone where appropriate? Encourage the biodiversity enhancement of sites through

development, for example, allocating sites which can deliver biodiversity enhancements? Require, through policy, increased long-term monitoring of biodiversity mitigation and enhancement measures on development sites?

- 8.4 Paragraph 175 of the NPPF sets out the approach for considering planning applications in the context of habitats and biodiversity so the Local Plan must conform to this. It should be borne in mind that well designed developments can enhance biodiversity so the policy should contain wording which allows this to happen.

Question 9.D: How should plan policies have regard to the new AONB Management Plan and Design Guidance?

- 8.5 Where relevant, the Local Plan should contain a clear hook to the AONB Management Plan. However, the Management Plan has a different legal status, therefore any policies which are to be drawn through which would be used in the setting of Local Plan policy or used as a material consideration in the determination of planning applications should be made very clear so that they can be consulted upon through the Local Plan process.

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

- 8.6 This approach is supported by Bloor Homes.

Question 9.F: Should the Council consider a policy requirement that new development take an active role in securing new food growing spaces? 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.**

8.7 This approach is supported in principle but should not be used to preclude or block development, but to help inform good design which incorporates applicable elements as set out above. Furthermore, monitoring will be essential as evidence of demand will be needed to inform local specifics for example whether there is need for allotments (local waiting lists or underused plots for instance).

8.8 It should be noted that land at Eccleshall Road, Stone provides opportunities for providing new allotments and/or a community garden.

Question 9.G: Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting?

8.9 Provided that the context is clearly justified it would be sensible and appropriate to include positively worded policies which would require an LVIA to accompany and inform development proposals.

8.10 A Landscape and Visual assessment has been carried out in respect of land at Eccleshall Road, Stone and the findings of this assessment is set out in the Promotional Document contained at **Appendix 2**.

Question 9.H: Do you consider there are areas in the Borough that should have the designation of Special Landscape Area? If so, explain where.

8.11 Recent case law has considered the issue of landscape value and what it means for a landscape to be valued. *Stroud DC vs. SSCLG [2015] EWHC 488 (Admin)* is clear that, whilst valued landscapes do not need to have a formal designation, 'valued' means something more than just 'popular'. Landscape is only 'valued' if it has physical attributes which take it out of the ordinary.

8.12 The Landscape Institutes' Guidelines for Landscape and Visual Impact Assessment ('the GLVIA') identifies various factors that may be relevant in the assessment of landscape value, including:

- Condition/Quality,
- Scenic Quality,
- Rarity and Representativeness,
- Conservation Interests,

- Recreation Value,
- Perceptual Aspects; and
- Cultural Associations.

8.13 Bloor Homes considers that further evidence is required if further designations are sought to determine landscape is 'special' or 'valued'. This should be evidenced having regard to the above criteria.

Question 9.J: Do you consider that the current "Design" SPD provides sufficient guidance for design issues in the Borough? Please explain your rationale.

8.14 The Design SPD is considered to provide sufficient guidance however, Bloor Homes considers this should be updated to reflect the National Design Guide, published in October 2019.

Question 9.L: To support a new Local Design Review Panel should the new Local Plan:

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

8.15 Bloor Homes considers if particular standards are already required at the national level there is no need to reiterate them locally as it is better to refer to them via a general policy hook, which would then be more flexible if the national context changes.

8.16 In relation to design and sustainability standards, it is acknowledged that the Code for Sustainable Homes has been withdrawn by the UK Government. However, it is noted that the BREEAM sustainability assessment can still be used, for new

residential, as well as other buildings. In light of the fact that there is no mandatory requirement for many of the identified standards it is considered that this should be left to the discretion of the developer, rather than included within local planning policy. Indeed, as Paragraph 150 b) of the NPPF states, any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Question 9.M: Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?

- 8.17 Bloor Homes considers that it is not necessary to designate Local Green Spaces through the new Local Plan. As these spaces are "*green areas of particular importance to local communities*" (ID: 37-005) it may be more appropriate to allow identification through the Neighbourhood Planning process.
- 8.18 In determining Local Green Spaces, regard must be had to the spatial development strategy to ensure they would not undermine the Local Plan's aim to "*identify sufficient land in suitable locations to meet identified development needs*" (ID: 37-007).

Question 9.N: Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so where? Are there any other Borough-wide facilities you feel should be associated with open space? Are there any settlements that you believe are lacking in any open space provision? Should the Council seek to apply Play England standards to new housing developments? Should the Council seek to apply Fields in Trust standard to providing sports and children's facilities? Should the Council seek to apply Natural England's ANGSt to new development? Should the Council seek to develop a bespoke standard in relation to open and/or play space? Do you consider that developments over 100 houses should incorporate features that encourage an active lifestyle for local residents and visitors? Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure? Should the Council require all high density schemes to provide communal garden space?

- 8.19 Bloor Homes considers that policy must be capable of being flexible to support the local context. Thresholds seem rather arbitrary and therefore Bloor Homes suggest it would be more appropriate to ensure that developments are prepared in line with

a design framework; one which references good practice and guidance which may well be subject to change throughout the Plan period.

- 8.20 It should be noted that the initial Development Framework Plan for land at Eccleshall Road, Stone identifies a significant new green infrastructure network to incorporate a range of recreational activities, including equipped play, natural play and a network of new routes to encourage walking and cycling.

Question 9.0: Should the Council seek to designate land within the new Local Plan 2020-2040 to address Borough-wide shortage of new sporting facilities? Identify within the new Local Plan the site in which a new swimming pool should be developed?

- 8.21 Bloor Homes consider policies will need to demonstrate proposals are deliverable, and any future requirements will need to be justified in order to provide certainty in terms of compliance with Regulation 122 of the CIL Regulations and the need for developer contributions should these be required. Further evidence will be required in respect of new sporting facilities as the plan progresses and this should be informed by any corporate strategy prepared by the Borough Council.

9. ENVIRONMENTAL QUALITY

9.1 Chapter 10 focuses upon environmental quality including air quality, noise and light pollution, and the management of waste.

Question 10.A: The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the Council:

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

9.2 In terms of ensuring the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles, it is considered that more evidence is required. Whilst the principle is supported by Bloor Homes, and local plan policies can provide the context for supporting such change, this will also depend on further detail: for example is the infrastructure appropriate; can the grid support capacity in the area being developed; and, what is the impact upon viability and deliverability?

9.3 In terms of Air Quality Management Zones, again it is considered that further evidence is required. This evidence should consider the potential impact upon sites of biodiversity (given that these will vary) and whether such zones would achieve proposed outcomes.

Question 10.B: The currently adopted Plan for Stafford Borough does not enforce any policy to mitigate for the impact 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?

9.4 Again, Bloor Homes consider further evidence is required to show what the impact is likely to be and whether this impact arises as a consequence of proposed development (in order to justify the need for mitigation). Any mitigation strategy would also need to consider the effect upon Plan viability.

Question 10.C: The currently adopted Plan for Stafford Borough makes reference to waste management in Policy N2. However, the growing population of Stafford Borough and the need for further action to combat climate change suggests the employment of further, more stringent measures encouraging sustainable waste disposal is desirable. Therefore, should the Council:

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

9.5 Bloor Homes considers that much more detail is required, particularly as this potentially overlaps with the role of the County Council and the Waste Local Plan. The current Waste Local Plan, covering the period 2010 - 2026 was adopted in 2013 and was reviewed in 2018. It is due for a further review in 2023, 'unless an earlier review is deemed necessary due to significant changes in national policy and guidance, local circumstances or our strategic priorities'. The new Local Plan for Stafford Borough needs to ensure it is conformity with the Waste Local Plan otherwise considerable confusion and uncertainty will arise.

10. LAND AT ECCLESHALL ROAD, STONE

- 10.1 Bloor Homes has an interest in approximately 25.74 hectares of land to the west of Stone, occupying an area of land between an existing housing allocation to the east and the M6 and safeguarded land associated with HS2 to the west. Eccleshall Road defines the boundary to the south of the site and a railway line, safeguarded land associated with HS2 and the floodplain associated with the Filly Brook beyond the northern boundary.
- 10.2 The site lies within site references: STO14 as identified within the Borough Council's Strategic Housing & Employment Land Availability Assessment (SHELAA) most recently published in 2019.
- 10.3 The emerging proposals are set out in the accompanying Promotional Document attached at **Appendix 2** to this representation. The Promotional Document brings together the findings of the initial technical and environmental studies which have informed initial masterplanning proposals for land at Eccleshall Road, Stone. The proposal, in summary, is set out below:

Land at Eccleshall Road, Stone

- 10.4 Land at Eccleshall Road, Stone is located approximately 2 miles to the west of Stone Town Centre and 2.1 miles from Stone Railway Station located to the east of the site.
- 10.5 The site is bound by to the north by Filly Brook and an existing railway line, along with Stone Golf Club located further north. West of the site is open countryside and Micklow Farm House adjoins the western boundary. The B5026 known as Eccleshall Road is situated along the southern boundary of the site.
- 10.6 To the south and east, the site is bounded by committed development proposals that are currently under construction.
- 10.7 The site is sustainably located in relation to public transport, located within walking distance of bus routes, and Stone Railway Station located approximately 2.1 miles to the east providing links with the major cities of Manchester, Liverpool, Birmingham and London among others.
- 10.8 The site constitutes greenfield land located adjacent to the confines of the existing settlement boundary for Stone.

10.9 The initial Development Framework Plan produced is landscape led. The site provides an opportunity to provide approximately 575 to 630 dwellings, a potential new primary school and a significant new green infrastructure network that provides an opportunity to deliver equipped play, natural play, community garden and a range of new habitats to support wildlife.

10.10 The proposal seeks to protect Micklow Woods and ensure seamless integration with development currently under construction to the east of the site.

10.11 Key Design Principles include:

- A primary site access via Eccleshall Road;
- Secondary streets serving clusters of development;
- Outward facing development providing natural surveillance over newly created public open space;
- Centralised public open space to blend seamlessly with neighbouring consented development providing a more coherent development;
- Green movement corridors providing foraging routes for wildlife and an enhanced ecology infrastructure;
- Cycle and pedestrian movement routes utilising the newly created green corridors;
- Possible cycle and pedestrian connections to neighbouring development;
- Potential location for 'first school' of up to 0.78 Ha;
- Utilised site low points for sustainable urban drainage;
- Maximum retention of existing green vegetation and incorporation of Sustainable Drainage Systems (SuDS);
- Potential location for a community garden for new and existing residents;
- Proposed landscape to provide transition on approach to Stone; and
- Proposed landscape structural enhancements to western boundary.

Availability

- 10.12 The site is owned by a single private landowner. Bloor Homes has entered into an agreement with the landowner to promote the site for residential development with the option to acquire the site for development. The site is available.
- 10.13 The most recent Strategic Housing and Economic Land Availability Assessment (SHELAA), published in 2019, considers land off Eccleshall Road (site reference ST014) as available and achievable with an assumed yield of approximately 629 dwellings. The assumed yield aligns to the emerging Development Framework Plan prepared by Bloor Homes.

Suitability

- 10.14 With regard to the suitability credentials of the site, it is located outside current settlement boundary but adjacent to the sustainable settlement of Stone and in proximity to public transport routes, services and facilities. Further evidence will be provided in respect of the nearby Site of Biological Importance, the Historic Environment Record and identified Landfill Buffer referenced within the SHELAA however, it is considered that all such matters can be addressed through a well-designed scheme and appropriate mitigation measures within the site. A number of Technical Reports have been commissioned to address these points and further information will be provided through the Local Plan Review process.
- 10.15 The most recent Strategic Housing and Economic Land Availability Assessment (SHELAA), published in 2019, considers land off Eccleshall Road (site reference ST014) as suitable.

Summary

- 10.16 Land at Eccleshall Road, Stone is a suitable and sustainable location for residential development and represents a deliverable proposition, being available now and providing every prospect that approximately 575 to 630 dwellings can be delivered. The suitability of the site is further detailed within the accompanying Promotional Document at **Appendix 2**. The proposal would make best use of existing infrastructure and provides the opportunity to deliver further facilities not limited to a new first school and a significant green infrastructure network.

11. CONCLUSION

- 11.1 Bloor Homes supports Stafford Borough Council's decision to commence a review of the Local Plan. This provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 11.2 In respect of the vision and objectives, Bloor Homes considers that the review should seek to distil elements of the current vision and objectives that remain relevant to the Borough, into a concise overview of change sought to 2040.
- 11.3 In respect of emerging policy choices, it is recognised by Bloor Homes that further evidence will be required to support policy requirements and that elements of this further evidence will form an iterative part of the plan-making process to respond to the emerging growth requirements and spatial development strategy.
- 11.4 In respect of housing growth Bloor Homes considers Growth Option Scenario F is the most appropriate option. This scenario aligns to the economic growth aspirations of the Borough and the affordable housing need set out in the EDHNA. As part of this requirement Bloor Homes supports the approach to a partial catch-up in respect of headship rates to ensure past household suppression is not forecast into the future.
- 11.5 Bloor Homes recognises that an existing committed supply of housing land will play a role in meeting the housing requirement between 2020 and 2040, however it will be necessary for the Council to ensure robust scrutiny of this supply and subject any uncommitted housing allocation to the same assessment as alternative site options through the plan-making process.
- 11.6 Bloor Homes does not consider it is necessary for the Council to rely on the delivery of a new Garden Community to meet an appropriate housing requirement for the Borough. If a Garden Community is incorporated within the spatial development strategy further flexibility should be provided within the planned supply to take account of the increased risks of delivery. As such Bloor Homes supports the pursuit of Growth Option 2 as the most appropriate distribution of housing growth to 2040, with an amendment to allow communities to bring forward additional growth where this would be supported locally through a Neighbourhood Development Plan. This approach would ensure all communities have the ability to meet housing needs in line with national guidance.

11.7 Land at Eccleshall Road, Stone is promoted by Bloor Homes as a suitable and sustainable location for residential development, representing a deliverable proposition, being available now and providing every prospect that approximately 600 dwellings can be delivered. The site is aligned to the various spatial development strategy options being considered by the Borough Council and would assist in delivering an appropriate housing requirement and supporting the economic aspirations of the Borough.

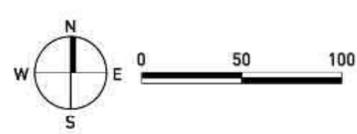
APPENDIX 1

SITE LOCATION PLAN



Rev A: Amended site boundary [24.03.20 CM]

REDLINE BOUNDARY (TBC)
 25.74 HA
 63.61 ACRES



LAND AT ECCLESHALL ROAD, STONE | SITE LOCATION PLAN

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APPENDIX 2

PROMOTIONAL DOCUMENT



ECCLESHALL ROAD STONE



PROMOTIONAL DOCUMENT

Prepared by Pegasus Group on behalf of Bloor Homes (Midlands) Limited

April 2020 | P19-1831

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CONTENTS

PAGE 3	1	PAGE 4	2	PAGE 6	3	PAGE 7	4	PAGE 16	5	PAGE 19	6
INTRODUCTION		THE DEVELOPMENT SITE		PLANNING CONTEXT		LANDSCAPE AND VISUAL		EMERGING PROPOSALS		CONCLUSIONS	

INTRODUCTION

BLOOR HOMES

- 1.1 Established in 1962, Bloor Homes is one of the UK's largest privately owned house building companies, completing in excess of 3,500 new homes each year. The Company has considerable experience in promoting and delivering strategic residential development sites across the country, ranging in size and complexity from those of around 50 dwellings to substantial mixed-use urban extensions of over 5,000 dwellings. The proposed scheme at Land off Eccleshall Road, Stone would be delivered by the Midlands Division of Bloor Homes.

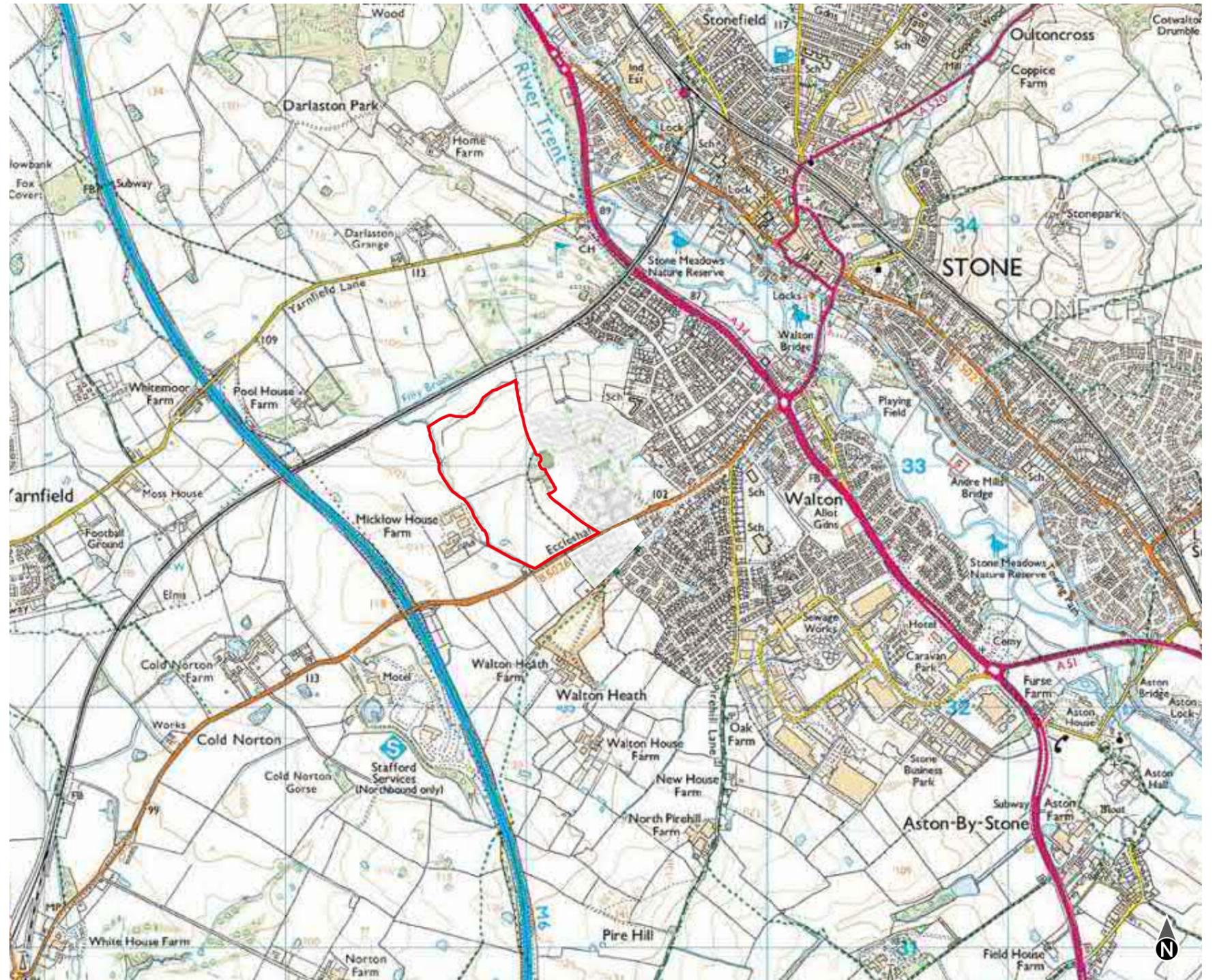
STAFFORD BOROUGH COUNCIL

- 1.2 Stone is identified as a sustainable settlement within the current Plan for Stafford Borough (adopted in June 2014) second only to Stafford. Stone is a focus for the provision of 10% of the Borough's new homes growth between 2011 and 2031.
- 1.3 Stafford Borough Council has commenced work on a review of the adopted Local Plan. The Local Plan Review provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals. Land at Eccleshall Road, Stone is being promoted by Bloor Homes as a suitable, available, deliverable and achievable site option through the Local Plan Review process.

PURPOSE OF THE DOCUMENT

- 1.4 This promotional document seeks to bring together the initial technical and environmental studies that have been undertaken by Bloor Homes' consultant team and explains the initial masterplanning proposals for land at Eccleshall Road, Stone. What is presented in this document is not intended to be a fully worked-up scheme but has been prepared for illustrative purposes to be used as the basis for engagement with the key stakeholders, including the Council, through Local Plan Review process.

Site Location • Not to scale

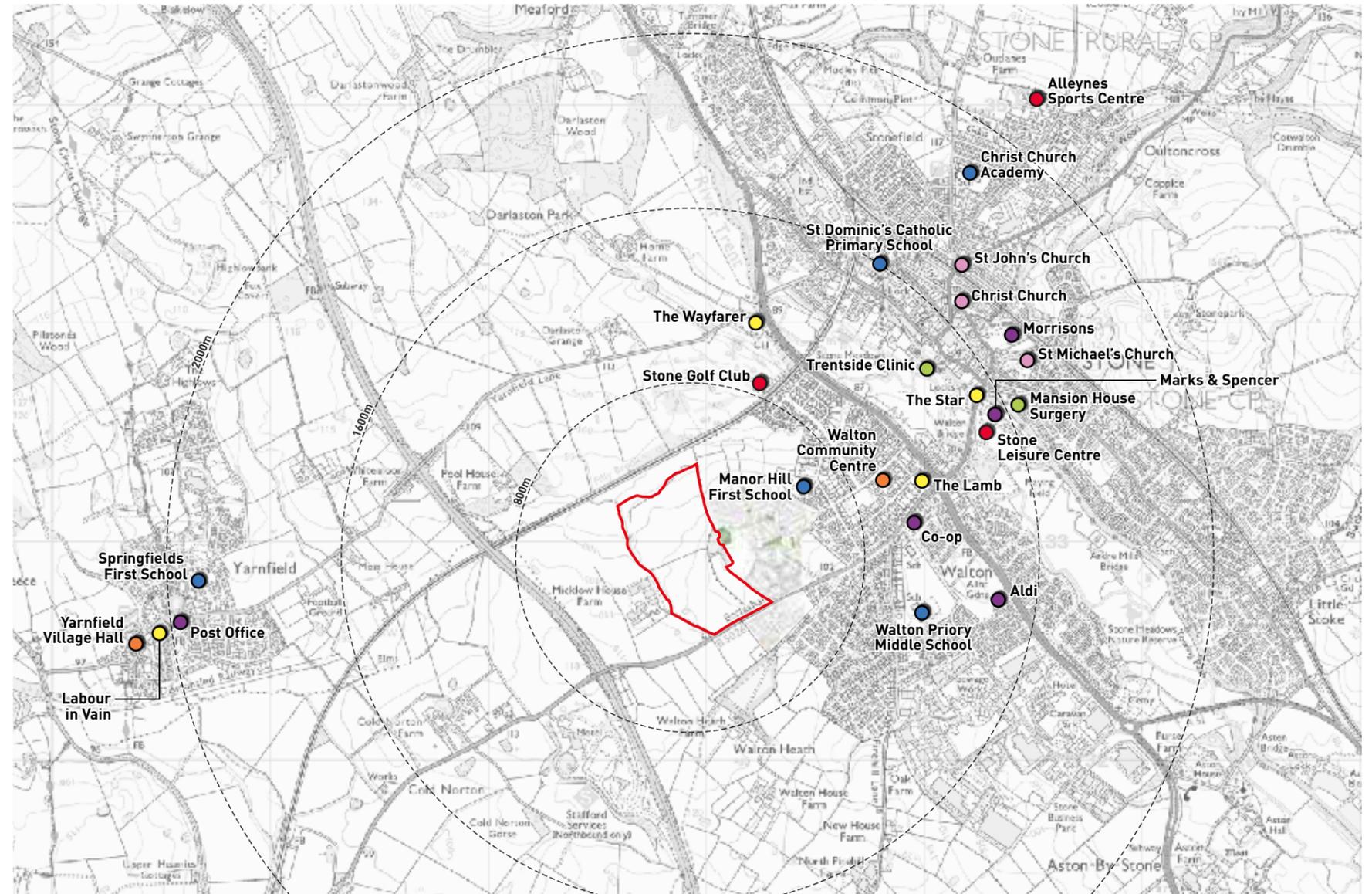


THE DEVELOPMENT SITE

STONE

- 2.1 Stone is an old market town in Staffordshire which serves a significant rural hinterland. Situated about 7 miles (11 km) north of Stafford, and around 7 miles (11 km) south of the city of Stoke-on-Trent, it is the second town in the Borough's settlement hierarchy after Stafford itself. From a national perspective it is located almost midway between Birmingham and Manchester.
- 2.2 Stone consists of two distinct areas bisected by the A34, a dual carriageway and major trunk route, and the River Trent which lies slightly east of but parallel to the road. To the west of the river is Walton, a predominantly residential area with housing development occurring in the main over the last 50 to 60 years. The town's main Business Park is also located here to the west.
- 2.3 To the east lies the town centre and the older pre-Victorian and Victorian residential areas.
- 2.4 The site is located within Walton to the west of the settlement, which comprises a wide range of services and facilities.

Local facilities • Not to scale



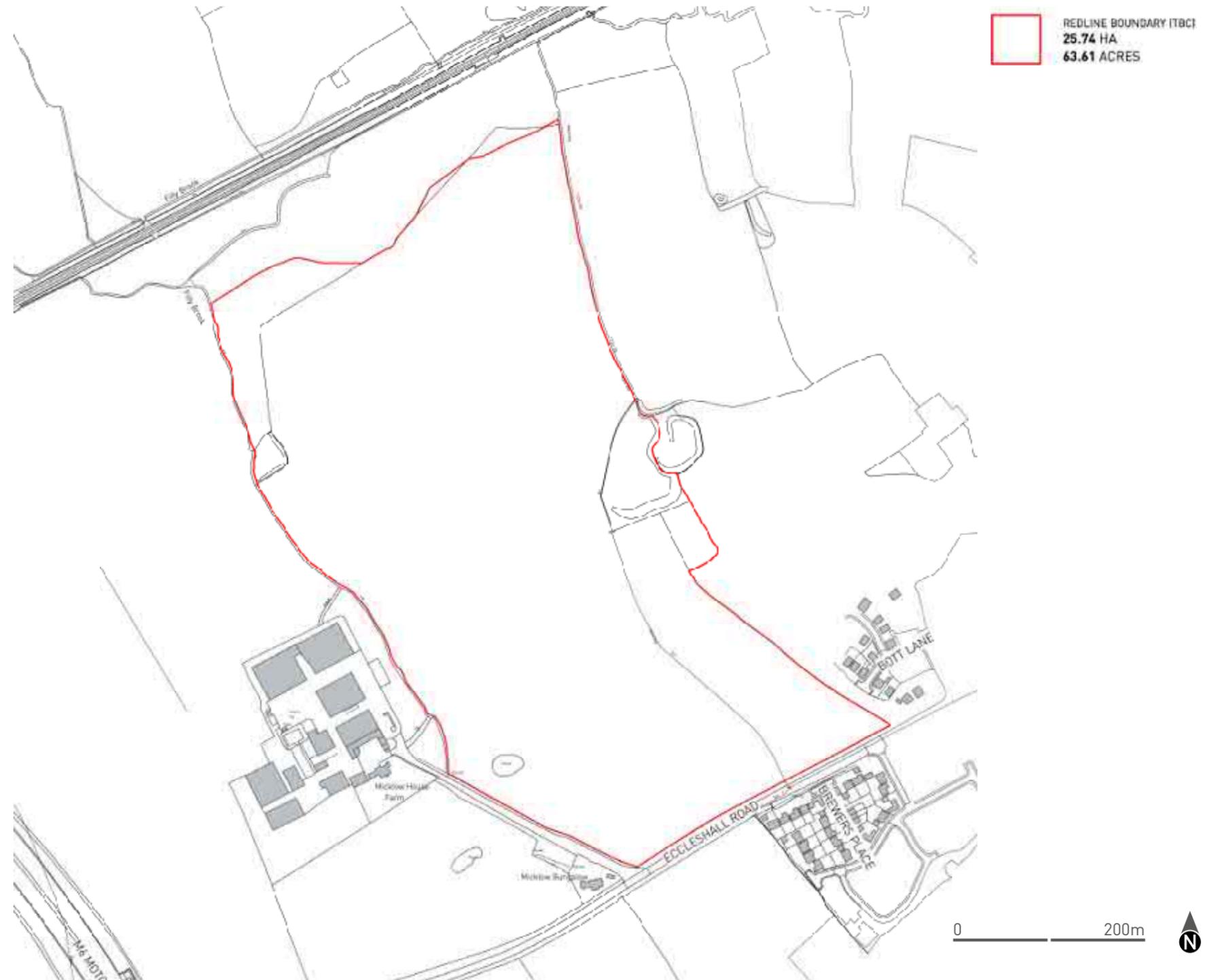
LEGEND



THE SITE

- 2.5 The site known as Land at Eccleshall Road extends over approximately 25.74 hectares, approximately 2 miles to the west of Stone Town Centre and 2.1 miles from Stone Railway Station located to the east of the site.
- 2.6 The site is bound by to the north by Filly Brook and an existing railway line, along with Stone Golf Club located further north. West of the site is open countryside and Micklow Farm House adjoins the western boundary. The B5026 known as Eccleshall Road is situated along the southern boundary of the site.
- 2.7 To the south and east, the site is bounded by committed development proposals that are currently under construction.
- 2.8 The site is sustainably located in relation to public transport, located within walking distance of bus routes, and Stone Railway Station located approximately 2.1 miles to the east providing links with the major cities of Manchester, Liverpool, Birmingham and London among others.
- 2.9 The site constitutes greenfield land located adjacent to the confines of the existing settlement boundary for Stone.

Site boundary • 1:5000



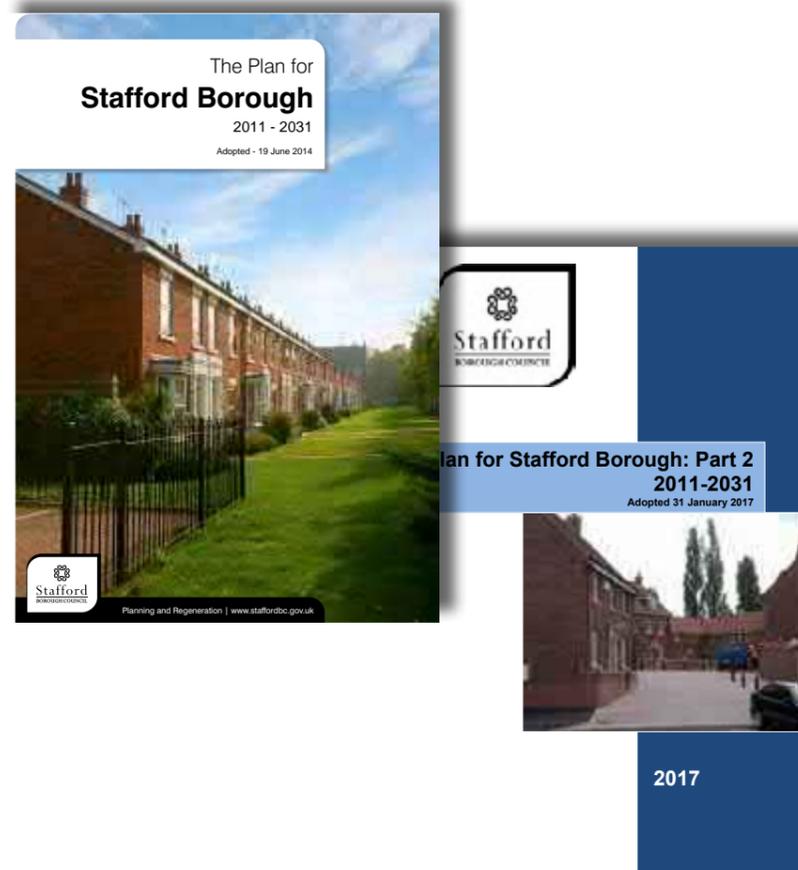
PLANNING CONTEXT

NATIONAL PLANNING POLICY

- 3.1 The latest National Planning Policy Framework (NPPF) was introduced in February 2019. The Government recognises that the planning system should be genuinely plan-led, with succinct and up-to-date local plans providing a positive vision for each District; a framework for addressing housing needs and other economic, social and environmental priorities that span a minimum 15 year period from adoption.
- 3.2 The NPPF requires local authorities to identify a sufficient amount and variety of land, that can come forward where it is needed, to support the Government's aim of significantly boosting the supply of homes. To determine the number of homes needed a local housing need assessment is required, conducted using the 'standard method.' This standard method identifies a local housing need for Stafford Borough of 408 dwellings per annum, including an uplift to take account of market signals and affordability. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account.

CURRENT DEVELOPMENT PLAN

- 3.3 The Development Plan for Stafford Borough currently comprises the adopted Plan for Stafford Borough 2011 to 2031 (adopted June 2014) and the Plan for Stafford Borough Part 2 (adopted January 2017).
- 3.4 At the local-level, Stone Town Council is currently at an advanced stage of preparing a Neighbourhood Development Plan for Stone. Once 'made' this document will form part of the development plan for development management decision within Stone. This Neighbourhood Plan has been subject to independent examination and a referendum is likely to take place in the near future.



LOCAL PLAN REVIEW

- 3.5 Stafford Borough Council has commenced work on a review of the adopted Local Plan. The Local Plan Review provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals. The review process will also ensure consistency with the new National Planning Policy Framework (NPPF), which seeks a requirement for local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years.
- 3.6 The most recent Strategic Housing and Economic Land Availability Assessment (SHELAA), published in 2019, considers land off Eccleshall Road (site reference ST014) as having capacity for 629 dwellings. The SHELAA considers the site to be available, suitable, achievable and potentially developable.
- 3.7 With regard to the availability credentials of the site, Bloor Homes can confirm that they have an agreement in place with the landowner to promote the site for residential-led development through the Local Plan Review process. Therefore, the site is available for development.
- 3.8 With regard to the suitability credentials of the site, it is located outside current settlement boundary but adjacent to the sustainable settlement of Stone and in proximity to public transport routes, services and facilities. Further evidence will be provided in respect of the nearby Site of Biological Importance, the Historic Environment Record and identified Landfill Buffer referenced within the SHELAA however, it is considered that all such matters can be addressed through a well-designed scheme and appropriate mitigation measures within the site. A number of Technical Reports have been commissioned to address these points and further information will be provided through the Local Plan Review process.

LANDSCAPE AND VISUAL

POLICY CONTEXT

- 4.1 Current policies relevant to landscape and visual matters include: Policy N4 The Natural Environment & Green Infrastructure and Policy N8 Landscape Character.
- 4.2 Policy N4 sets out that the Borough's natural environment will be protected, enhanced and improved by a series of measures including ensuring new development includes appropriate mitigation.
- 4.3 It states that local landscape and heritage features should be conserved and enhanced and inform the master planning and design of new neighbourhoods; be positively managed to conserve and enhance their significance and contribution to the character of the landscape; and be accessible to local communities for leisure and recreation.
- 4.4 It also states that new developments should be set within a well-designed and maintained attractive green setting and provide a variety of spaces to meet the needs of people and nature.
- 4.5 Policy N8 sets out that development proposals must be informed by, and be sympathetic to, landscape character and quality. The policy also states that development should demonstrate that proposals with landscape and visual implications, should protect, conserve and, where appropriate, enhance:
- "a. The elements of the landscape that contribute to the local distinctiveness of the area (including heritage assets, cultural character and biodiversity);
- b. Historic elements of the present-day landscape that contribute significantly to landscape character;

c. The setting and views of or from heritage assets, including conservation areas, Registered Parks and Gardens, Scheduled Monuments, Listed Buildings and assets identified in the Historic Environment Record;

d. The locally distinctive pattern of landscape elements such as woodland, streams, hedgerows, trees and field boundaries."

- 4.6 The policy sets out that new development should reinforce and respect the character of the settlement and the landscape setting, through the design and layout that includes use of sustainable building materials and techniques that are sympathetic to the landscape.

NATIONAL LANDSCAPE CHARACTER

- 4.7 The site is located within National Character Area Profile 61: Shropshire, Cheshire and Staffordshire Plain, as published by Natural England (2014). The Shropshire, Cheshire and Staffordshire Plain National Character Area (NCA) is an expanse of flat or gently undulating, pastoral farmland.

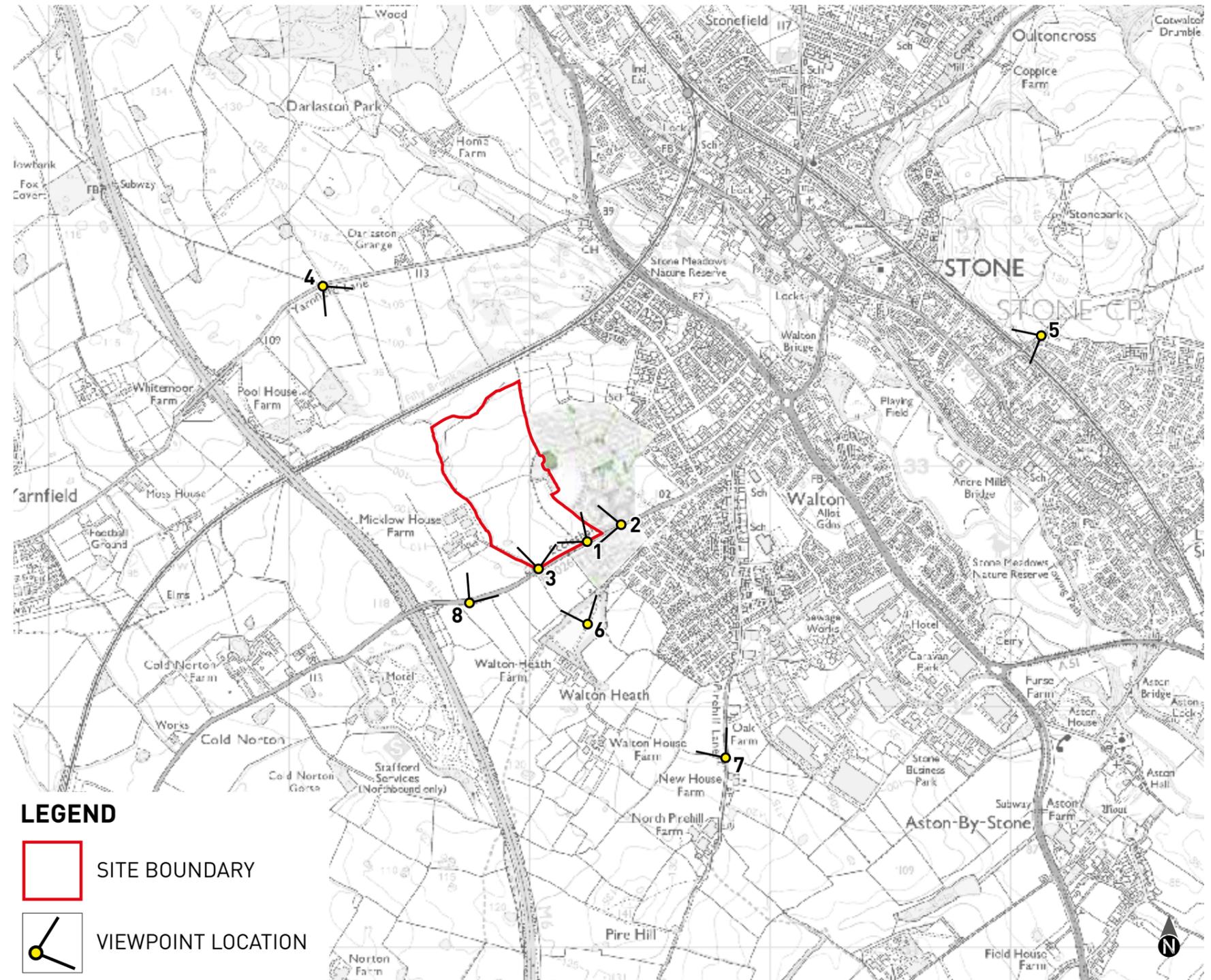
COUNTY LANDSCAPE CHARACTER

- 4.8 The site is located within the 'Settled Farmlands' landscape character type, as identified in the Staffordshire Landscape Character Assessment. This landscape character type is described as:
- "...a landscape of mixed arable and pastoral farmland in which farming practices vary from low intensity, still retaining an intact ancient pattern of hedgerows and hedgerow trees, to areas of more intensively farmed arable and improved pasture."***
- 4.9 Its sets out that:
- "This landscape has a very rural feel, with the small winding country lanes linking the large numbers of traditional style red brick farms and old settlements. Industrial and commuter development, however, are now generally impacting on this character quite strongly. General decline, both of settlement pattern and landcover elements, is resulting in long term irreversible changes to the overall character of the landscape."***
- 4.10 Those factors considered to be critical to landscape character and quality are:
- "...the loss of characteristic landscape features, the poor condition of those features that remain, and the relatively poor survival of characteristic semi-natural vegetation (i.e. ancient woodland and hedgerows, semi-natural grasslands and riparian and wetland vegetation)."***
- 4.11 The published character assessment also sets out 'landscape restoration' policy objectives for this area. The site and its immediate context is not however located within either an 'area of highest landscape sensitivity' or 'landscape at risk of rapid loss of character and quality'.

VISUAL AMENITY

- 4.12 A series of photographic viewpoints have been taken that are representative of visual receptors in the area. These photographs illustrate the views towards the site in the context of the surrounding landscape.
- 4.13 Overall, views towards the site are generally limited to the local context by the mature network of vegetation, including woodlands and hedgerows associated with field boundaries, combined with the physical boundary of the M6 motorway corridor to the west, which is also vegetated.
- 4.14 At a local level, there are views of the site from Eccleshall Road itself and from the residential settlement edge of Stone. In local views, the site is typically seen in the context of existing and emerging new residential development as the allocated housing site to the east continues to be built out. This also includes recently built properties at Sweepers Avenue to the south of the site.
- 4.15 There are middle distance views to the site from more elevated areas to the south, for example from Walton Heath open access land and footpath; and from a byway along Pirehill Lane. Views from further south are limited by the undulating topography of the landscape to the south-west of Stone, which includes Pire Hill.
- 4.16 From the north there are middle distance views from Yarnfield Lane looking across the Filly Brook valley to the rising topography of the valley side, including the site. Views from further north are limited by the combination of undulating topography and vegetation, including large woodland blocks such as that at Darlaston Park.
- 4.17 From the west, views towards the site are limited by the M6 motorway corridor which passes through the landscape west of the site. The motorway is in cutting near Micklow House Farm, is at grade further north and passes over the railway line to the north-west of the site. The motorway corridor is well vegetated in this location.
- 4.18 From the east, views are generally limited by the settlement pattern of Stone, although there are some potential longer distance views towards the site from higher ground north-east of Little Stoke.

Viewpoint photograph locations • Not to scale



1



View looking north-west towards the site from Eccleshall Road

2



View looking east towards the site from Eccleshall Road

3



View looking north across the site from the boundary hedgerow along Eccleshall Road

4



View looking south-east from Yarnfield Lane



View looking south-west from Pingle Lane



View looking north-west from Common Lane

7



View looking looking north-west from Pirehill Lane

8



View looking north-east towards the site from Eccleshall Road

LANDSCAPE ANALYSIS

- 4.19 The constraints and opportunities for the site and its surrounding landscape context have been identified following the review of baseline information on landscape and visual matters.
- 4.20 The constraints for the site are considered to be:
- Albeit relatively limited, the local PROW network (providing recreational opportunities for potential high sensitivity visual receptors); and
 - The relationship between the site and surrounding countryside, including its position on the southern slope of a small valley (Filly Brook) and the requirement to keep development away from the site's high point to reduce potential visual impact; and
 - The existing hedgerow and tree network, including a small woodland copse along the eastern boundary of the site, and the requirement for appropriate setbacks to retain and protect it.
- 4.21 Landscape and visual opportunities can be summarised as follows:
- The site itself is not subject to any statutory landscape planning designations;
 - The physical and visual relationship of the site to the existing and emerging settlement edge, including the backdrop of new housing development in local views towards the site;
 - The presence of the M6 motorway corridor which acts as a detractor, and the future baseline scenario of the High Speed 2 rail line which will occupy land to the west of the site, reducing the susceptibility of the landscape at a local level;
 - The presence of mature vegetation across the local landscape including hedgerows, hedgerow trees, woodland associated with the stream valley to the north and some woodland blocks, in combination with the undulating landform, helps to minimise the visual envelope of the site and contributes to the capacity of the site to accommodate development; and
 - Existing vegetation throughout the site itself, including hedgerows and a small woodland copse, providing opportunities to enhance this through a comprehensive landscape strategy.

LANDSCAPE CAPACITY

- 4.22 In relation to landscape and visual matters and as set out in the Guidelines for Landscape and Visual Impact Assessment (3rd Edition), landscape susceptibility is the ability of a landscape to accommodate change without undue consequences for the maintenance of the baseline situation. Different types of development can affect landscapes in different ways; therefore, landscape susceptibility is specific to the type of development proposed (i.e. in this case, residential use).
- 4.23 In terms of the susceptibility of the site and its immediate landscape context, local landscape character is influenced predominantly by a combination of transport corridors including the railway line and M6 motorway, as well as the B5026 Eccleshall Road (the main route into and out of the settlement on this edge of Stone); and the settlement edge itself, including emerging development to the east of the site and recently built development to the south. Local vegetation patterns include a strong hedgerow and hedgerow tree network and some woodland blocks.
- 4.24 Whilst the topography of the site itself on the southern slope of the Filly Brook stream valley allows middle distance views from the north, the landform of the wider context in combination with woodland blocks, built form and field boundary vegetation means that the visual envelope of the site is limited.

- 4.25 The site and its immediate context are also influenced by extensive (and future) reference to the type of development proposed (i.e. new housing) to the east and south of the site. The presence of the M6 motorway corridor as a detracting feature, and the future baseline scenario of the High Speed 2 rail line which will occupy land to the west of the site, also has an influence.
- 4.26 Elements such as hedgerows and trees can be addressed by appropriate stand offs between proposed built form and vegetation. Therefore, opportunities are available to retain these landscape elements where possible as part of a scheme, reducing susceptibility; there are also opportunities for the creation and enhancement of new green infrastructure and landscape planting which would be beneficial to the local landscape character and this would also reduce susceptibility.
- 4.27 Overall, it is considered that in relation to the matters described above, the site and its immediate context (i.e. the local landscape character) is generally of low susceptibility in landscape terms to the type of development proposed. It is considered therefore that it retains capacity for development in landscape and visual terms.

LANDSCAPE & VISUAL STRATEGY

4.28 The key elements which should be incorporated into a landscape strategy for the site are summarised as follows.

DEVELOPMENT ENVELOPE

4.29 The development envelope is influenced by the landscape and visual constraints and opportunities described earlier in this report.

4.30 To the north the envelope is defined by an offset to the boundary with the railway line and the existing green infrastructure (including hedgerows and a tributary to Filly Brook). Here, the sites' low point will provide drainage and attenuation.

4.31 To the west the development envelope is defined by an offset to the existing boundary vegetation to allow for additional structural landscape planting. This will enhance the existing landscape framework in order to provide screening and filtering of views both into the site from the wider landscape and some amenity protection both from the M6 motorway corridor and from the HS2 rail line for residents of the proposed development.

4.32 To the east the development envelope is influenced by the woodland copse, which is a distinct landscape feature on the site, and the rising topography of the site which reaches ca. 115-120m AOD along its eastern boundary. As a result, the development envelope is set broadly below the 115m contour line to reduce potential visual impacts and create new public open space that will connect seamlessly with that consented on the allocated site to the east. The proposals also allow for a potential local park and play space at the 120m high point, where views to the surrounding landscape will be retained.

4.33 To the south, the development envelope is influenced by views on the approach into the settlement, and as such it is set back from the south-western corner of the site. A proposed 'frontage' landscape treatment will help to filter and soften views of new housing along this edge.

STRATEGY FOR EXISTING VEGETATION

4.34 Around any potential development envelope, consideration will be given to the existing vegetation (including trees, hedgerows and hedgerow trees). Where possible these landscape elements will be retained and integrated.

4.35 Where existing vegetation is retained this will be subject to appropriate maintenance and management in order to conserve and enhance its structure and condition. Whilst not primarily a landscape and visual matter, the retention and management of vegetation, along with proposed landscape planting, will have benefits for biodiversity and ecology.

GREEN INFRASTRUCTURE & OPEN SPACE

4.36 The retained areas of vegetation and new infrastructure planting (as described above) would help ensure that the built form of a proposal would be contained as much as possible in a robust and diverse framework of green infrastructure. A strategy for retaining existing vegetation combined with proposals for extensive landscaping would result in a landscape context for any future proposals which show a variety of stages of establishment and maturity. This would enhance the quality of a proposal and help to integrate the site with the local landscape character.

LANDSCAPE SCHEME & DETAILED DESIGN

4.37 All proposed landscape mitigation would be subject to a high-quality detailed landscape scheme that will ensure that the functions of the landscape components are delivered; this will also reflect positively on the design quality of the proposed development as a whole and allow any new development to tie in and complement the emerging new residential edge to the east. At detailed design the selection of species for trees and woodland will refer to native species as well as those present in the context of the local landscape.





EMERGING PROPOSALS

SITE & CONTEXTUAL CONSIDERATIONS

Access

- 5.1 At present there are no access points into the site along the southern boundary with Eccleshall Road. A pedestrian footway to Stone is planned along northern side of Eccleshall Road associated with the housing allocation currently under construction. This will fall approximately 65m short of the south eastern extent of the site, however the presence of a generous grass verge provides opportunity for this to be extended. A pedestrian footway is available to the south of Eccleshall Road from Horn Lane. No public rights of way cross the site itself.

Landscape

- 5.2 The site is located outside of the Green Belt and comprises of three fields, each marked by internal hedgerows and a number of mature trees. Views towards the site are generally limited to the local context by the mature network of vegetation, including woodlands and hedgerows associated with field boundaries, combined with the physical boundary of the M6 motorway corridor to the west, which is also vegetated. At a local level the site is typically seen in the context of existing and emerging new residential development as the allocated housing site to the east continues to be built out.

Ecology

- 5.3 Field boundaries and perimeter edges are generally defined by hedgerows. These, together with hedgerow trees, two small tree groups to the west of the site and a proportion of Micklow Wood to the eastern boundary are assumed to be likely of most ecological sensitivity. Micklow Wood, centrally located, along the eastern boundary is recognised as a Site of Biological Importance (SBI). The initial Development Framework Plan offsets new development from the SBI and the majority of the other features/ areas and significantly compensates for those which are lost.
- 5.4 The site lies within a 15km buffer associated with Cannock Chase Special Area of Conservation (SAC). An existing Cannock Chase SAC mitigation strategy requires financial contributions towards projects within Cannock Chase to mitigate recreational pressures.

Heritage

- 5.5 The site is not located within or adjacent to a Conservation Area. In addition, there are no listed buildings within or within the vicinity of the site. It is recognised that the site lies within a Historic Environment Record Area (HER) relating to an area of water meadow.

Flood Risk

- 5.6 Environment Agency mapping confirms the site falls entirely within Flood Zone 1 and suggests that far western area of the site is the most susceptible to surface water flooding.

Topography

- 5.7 Site low points have been estimated and are assumed to be located towards the north and west of the site. Site topography is not considered to pose a significant constraint to development.

Land Uses

- 5.8 Agricultural land extends to the north, west and south-west of the site. A recently constructed residential development is located to the south east of the site to the south of Eccleshall Road and further residential development is currently being constructed by a number of housebuilders to the east of the site. The site excludes all land safeguarded for HS2.

Utilities and services

- 5.9 None known or taken into account at this stage.

INDICATIVE PROPOSAL

- 5.10 The initial Development Framework Plan produced is landscape led. The site provides an opportunity to provide approximately 575-630 dwellings (at between 37 and 40 dwellings per net hectare), a potential new primary school and a significant new green infrastructure network that provides an opportunity to deliver equipped play, natural play, community garden and a range of new habitats to support wildlife. The proposal seeks to protect Micklow Woods and ensure seamless integration with development currently under construction to the east of the site.

Key Principles

- Primary site access achieved via Eccleshall Road;
- Primary vehicular movement, providing access to wider movement infrastructure;
- Secondary streets serving clusters of development;
- Outward facing development providing natural surveillance over newly created public open space;
- Centralised public open space to blend seamlessly with neighbouring consented development providing a coherent scheme with strategic centralised greenspace;
- Green movement corridors providing foraging routes for wildlife and an enhanced ecology infrastructure;
- Cycle and pedestrian movement routes utilising the newly created green corridors;
- Possible cycle and pedestrian connections to neighbouring development;
- Safeguarded land for HS2 development to north and west of site;
- Potential location for 'first school' of up to 0.78 Ha;
- Utilised site low points for Sustainable Drainage (SuDS);
- Maximum retention of existing green vegetation;
- Location for potential community garden for new and existing residents;
- Potential location for community orchard for new and existing residents;
- Proposed frontage landscape on approach to Stone; and
- Proposed landscape structural enhancements to western boundary.



LEGEND

-  SITE BOUNDARY (TBC)
25.74 HA
63.61 ACRES
-  PROPOSED RESIDENTIAL DEVELOPMENT PARCELS
NOA 13.78 HA / 33.90 ACRES
UP TO 430 DWELLINGS (AT 40 DPH)
-  POTENTIAL SITE ACCESS
VIA ECCLESHALL ROAD (TBC)
-  EXISTING PRIMARY INFRASTRUCTURE
-  PRIMARY MOVEMENT ROUTE
-  SECONDARY MOVEMENT ROUTE
-  GRASCRETE EMERGENCY ACCESS ROAD
-  POTENTIAL EMERGENCY ACCESS POINT
VIA ECCLESHALL ROAD (TBC)
-  POTENTIAL PEDESTRIAN/CYCLE ROUTES
WITHIN DEVELOPMENT
-  POTENTIAL FLOODING FOR RIVERS AND SEAS
E.A 26.09.19
-  EXISTING VEGETATION
-  PROPOSED LANDSCAPE STRUCTURAL ENHANCEMENTS
TO WESTERN BOUNDARY
-  PROPOSED PLANTING
-  PROPOSED "FRONTAGE" LANDSCAPE ON APPROACH
-  ORNAMENTAL PLANTING
-  SUSTAINABLE URBAN DRAINAGE (TBC)
-  SAFEGUARDED LAND FOR FUTURE HS2 LINE
[BOUNDARY TAKEN FROM HIGH SPEED RAIL (WEST MID
MIDLANDS - CREWE)
REF: CT-06-222-RL / CT-06-222
-  KEY FOCAL SPACES
-  LONG DISTANCE VIEWS TO WIDER CONTEXTUAL
LANDSCAPE
-  POTENTIAL LOCATION FOR 'FIRST SCHOOL' (TBC)
-  POTENTIAL LOCALLY EQUIPPED AREA OF PLAY
-  AREA OF NATURAL PLAY
-  POTENTIAL POINTS OF CONNECTION TO NEIGHBOURING
PEDESTRIAN MOVEMENT INFRASTRUCTURE
-  INDICATIVE CONTOUR LEVELS (TBC WITH
TOPOGRAPHICAL REPORT)

0 200m 



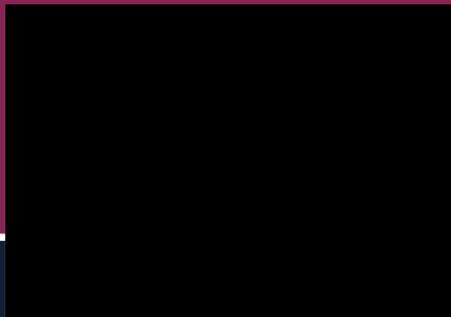
CONCLUSIONS

SUMMARY

- 6.1 The Council has commenced work on a review of the Local Plan. This document is intended to a comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 6.2 Stone is the second largest settlement within Stafford Borough and recognised as a sustainable location for growth. There are a good range of services and facilities available within the town and further investment in these services and associated infrastructure is planned and could be further supported by planned growth.
- 6.3 Bloor Homes' emerging proposals for land at Eccleshall Road would be capable of contributing positively to meeting the housing needs of the Borough to 2040 within the sustainable settlement of Stone.
- 6.4 Land at Eccleshall Road would deliver up to approximately 600 dwellings with access achievable from Eccleshall Road. There would be the opportunity to provide for a range of dwelling types and sizes at a density that would respect the adjacent pattern of development on the modern developments currently under construction to the east and the south of the site. Land at Eccleshall Road represents the logical location for meeting the development needs within Stone to 2040.
- 6.5 The initial assessments on matters such as heritage, landscape, drainage, flooding and transport contained within this Promotional Document indicate that there are no overriding constraints which would restrict development in this location.
- 6.6 Bloor Homes is continuing to commission further surveys and other related work to refine the proposals for land at Eccleshall Road. As part of this refinement process it is Bloor Homes' intention to engage with the Council and other stakeholders to discuss the range of issues associated with a housing proposal of this type.

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PLANNING | DESIGN | ENVIRONMENT | ECONOMICS | HERITAGE



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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		Mr
First Name		Stuart
Surname		Wells
E-mail address		
Job title (if applicable)		Associate Planner
Organisation (if applicable)	Lovell Homes	Pegasus Group
Address		
Postcode		
Telephone Number		

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

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

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

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

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

Please note:

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

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

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

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

Please use a continuation sheet if necessary

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

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

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

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

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

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

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

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

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

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STAFFORD BOROUGH LOCAL PLAN 2020-2040

ISSUES & OPTIONS (JANUARY 2020)

LAND AT THE CRESCENT, DOXEY, STAFFORD

ON BEHALF OF LOVELL HOMES

LOVELL
HOMES

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester
PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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CONTENTS:

	Page No:
1. INTRODUCTION	2
2. CONTEXT	4
3. EVIDENCE	5
4. VISION & STRATEGIC OBJECTIVES	6
5. SUSTAINABILITY & CLIMATE CHANGE	8
6. THE DEVELOPMENT STRATEGY	10
7. DELIVERING HOUSING	20
8. DELIVERING QUALITY DEVELOPMENT	30
9. ENVIRONMENTAL QUALITY	36
10. LAND AT THE CRESCENT, DOXEY, STAFFORD	38
11. CONCLUSION	42

APPENDICES:

APPENDIX 1: SITE LOCATION PLAN

APPENDIX 2: PROMOTIONAL DOCUMENT

EXECUTIVE SUMMARY

This representation, submitted on behalf of Lovell Homes, responds to the Council's Issues & Options consultation document. Lovell Homes supports Stafford Borough Council's Local Plan Review process to ensure development is genuinely plan-led to 2040.

Lovell Homes has an interest in approximately 3.1 hectares of land adjacent to the north of Doxey, Stafford, occupying an area of land adjacent to existing residential development at The Crescent (**Appendix 1**).

To support the allocation of land at The Crescent, Doxey, Stafford a Promotional Document has been prepared (**Appendix 2**) to provide information in respect of the site and to introduce a potential development scheme for approximately 109 dwellings (**Appendix 2**).

1. INTRODUCTION

1.1 These representations are made by Pegasus Group, on behalf of Lovell Homes, in response to the Stafford Borough Local Plan Review (2020 – 2040) 'Issues and Options Consultation Document February 2020.' This representation relates to land at The Crescent, Doxey, Stafford which is within the control of Lovell Homes. These representations should be read alongside the accompanying:

- Site Location Plan (**Appendix 1**)
- Promotional Document (**Appendix 2**)

1.2 Evidence is provided, in association with these representations to support the allocation of land at The Crescent, Doxey, Stafford. This evidence is in the form of a Promotional Document (**Appendix 2**) which provides information about the specifics of the site and a potential development scheme. The Promotional Document draws on technical assessments and introduces an Indicative Masterplan showing how the site could be developed. The site-specific information provided demonstrates that the site is suitable, developable and deliverable and that it would be sound to identify the site as part of the Local Plan Review process. The information contained within the Promotional Document demonstrates that land at The Crescent, Doxey, Stafford can deliver in the order of 109 dwellings.

1.3 These representations respond to the 'Issues and Options' consultation document and accompanying published evidence, having regard to the national and local policy context. Where appropriate, Lovell Homes provides a response to the specific questions set out within this document.

1.4 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:

- a) **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;

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- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.5 The representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2. CONTEXT

- 2.1 Lovell Homes supports Stafford Borough Council's decision to commit to a review of the adopted Stafford Borough Local Plan. This provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 2.2 The most recent National Planning Policy Framework (NPPF) (February 2019) requires local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years. The proposed timescales, as set out within the Local Development Scheme, will ensure that an up to date Local Plan for the District will be in place to support growth and meet future development needs.
- 2.3 The Local Plan Review is necessary in order to respond to the need for continued growth within the Borough to 2040 and to ensure consistency with national policy and guidance.
- 2.4 The Issues and Options consultation follows previous Issues consultation, which scoped issues that affect the Borough, and looked at options for addressing them. The Issues document also set out a proposed new settlement hierarchy that had regard to the Settlement Assessment. The current consultation document utilises the response to the previous consultation to further explore the vision and strategic objectives to 2040 and highlights a range of growth and spatial strategy options for delivering growth within the Borough.
- 2.5 Lovell Homes supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up to date policy framework exists within the District to guide growth to 2040 and to ensure that development is genuinely plan led.

3. EVIDENCE

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

- 3.1 The list of assessments and studies identified within the consultation document represents a suitable list, however it should be recognised that this evidence should be refreshed throughout the review process where necessary to reflect changing circumstances or guidance. In addition, Lovell Homes recognises that elements of the evidence base will need to be iterative with the emerging growth requirements and spatial distribution of growth.
- 3.2 The vision is supported by Lovell Homes and reflects the existing Vision contained within the adopted Local Plan Strategy which remains appropriate for an extended plan period to 2036.

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

- 3.3 Paragraph 1.10 makes reference to an 'Infrastructure Delivery Programme' which is assumed to represent an Infrastructure Delivery Plan identifying the necessary infrastructure to support new development. Again, it is recognised that this will be refined at each stage of the plan making process being intrinsically linked to any preferred spatial strategy and the outcome of discussions through the Duty to Cooperate.

4. VISION & STRATEGIC OBJECTIVES

- 4.1 It is noted that the adopted Local Plan contains a detailed Vision and a significant number of Key Objectives. Both the Vision and Key Objectives contain a number of spatially specific elements i.e. Stafford, Stone or lower tier settlement specific elements. Lovell Homes considers it is necessary to review this approach.

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

- 4.2 Lovell Homes considers that the Vision contained within the adopted Local Plan is overly protracted and fails to clearly and succinctly set out a comprehensive vision for the Borough.
- 4.3 The Local Plan Review process provides a perfect opportunity to distil the current Vision into a locally relevant, yet Borough-wide Vision that clearly aligns to the spatial change sought in Stafford Borough to 2040.

Question 3.B: Do you agree that the Vision should be shorter?

- 4.4 Lovell Homes agrees the Vision should be shorter as set out above. This could be achieved through the removal of the sub-sections for both Stafford and Stone which would sit more usefully within a Neighbourhood Plan to be defined and refined by local communities.

Question 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?

- 4.5 The 'Scoping the Issues' consultation summary contained within the current consultation document identified the support for renewable energy sources and the future proofing of new development via the use of technology as reoccurring or key responses.
- 4.6 It is recognised that Stafford Borough Council has declared a 'climate emergency' and has committed to preparing a report to set out how the Council proposes to respond. The implications of climate change for emerging policy to be contained within a new Local Plan should be informed by the Council's Climate Change Strategy/Report currently in preparation. Lovell Homes considers that any recognition of Climate Change to be incorporated within the Vision should await the outcome of the Council's corporate stance on climate change.

Question 3.D: Should the spatially-based approach to the objectives be retained? Does this spatially-based approach lead to duplication?

4.7 Lovell Homes considers the 28 key objectives contained within the adopted Local Plan to be protracted and repetitive. This is, in part, due to the spatially-based approach taken by the Borough Council previously.

4.8 In line with comments in respect of the Vision, Lovell Homes consider that the review provides an opportunity to distil elements of the current objectives that remain relevant to the Borough, into a concise set of Borough-wide objectives.

Question 3.E: Is the overall number of objectives about right?

4.9 Lovell Homes considers the list of current objectives is far too long. A shorter list of succinct, locally relevant Borough-wide objectives would provide greater clarity and understanding of the most important areas of change or protection within the Borough.

Question 3.F: Should there be additional objectives to cover thematic issues? If so what should these themes be?

4.10 Lovell Homes does not support the preparation of additional objectives, but reconsideration of the existing objectives. Updated objectives should include:

- Approach to spatial distribution of growth to support sustainable communities
- Meeting housing needs
- Economic growth requirements
- Infrastructure delivery
- Range of locally relevant thematic topics that would include climate change, centres, leisure, heritage, ecology, landscape and the creation of high-quality new development.

5. SUSTAINABILITY & CLIMATE CHANGE

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. 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? What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the Borough?

- 5.1 Whilst it is commendable to deliver enhanced energy efficiency as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.

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?

- 5.2 Whilst it is commendable to deliver renewable and low carbon energy as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.

- 5.3 The ability for large developments to source a certain percentage of their energy supply from on-site renewables will need to be balanced with the burden of delivering other infrastructure requirements that will be required to support the chosen spatial strategy to ensure the delivery of sustainable communities.

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

- 5.4 Whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such

requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. 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 PPG. This evidence does not appear to be present.

- 5.5 The policy approach should be informed by a Water Cycle Study to determine whether the scale, location and timing of planned development within the Borough would give rise to issues from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.

6. THE DEVELOPMENT STRATEGY

6.1 Lovell Homes supports the review of the spatial development strategy to establish the scale and distribution of new housing and employment development to 2040.

Question 5.A: Do you consider that the existing Policy SP1 addresses the requirements of the NPPF? Do you consider that it is necessary to retain this policy in light of the recent changes in Planning Inspectorate's view?

6.2 Policy SP1 contained within the existing Plan for Stafford Borough broadly addresses the requirements of the NPPF. It is considered appropriate to retain a policy committing the Council to applying the presumption of sustainable development within any new Plan for the Borough to 2040. The continuation of such a policy is therefore recommended by Lovell Homes.

Question 5.B: 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? Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

6.3 The preparation of the EDHNA is noted by Lovell Homes. The approach taken in the EDHNA to consider a range of scenarios and accelerated headship rates is supported, particularly in respect of the consideration of balancing housing delivery with economic growth likely to be experienced and supported through the aspirations of the Borough.

6.4 Scenario A, which represents the Standard Method, relies on the SNHPs which draws from past trends.

6.5 The Government confirms the use of the 2014 Sub-National Household Projections to provide the demographic baseline for the assessment of housing need in the short term and the Government's intention to review the formula and consider amending the method in the longer term. The baseline figure represents a minimum figure and does not account for additional housing demand that may arise as a direct result of economic growth during the plan period. Furthermore, it does not include meeting housing needs arising from neighbouring authorities.

6.6 It represents a position that does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour, including meeting cross-boundary needs. Lovell Homes

therefore does not consider that this represents the most appropriate annual housing requirement for Stafford Borough.

- 6.7 Scenario's B and C represent a housing requirement that is lower than the Standard Method. There are no exceptional circumstances that can be demonstrated in Stafford Borough to justify an annual housing requirement below the Standard Method. Lovell Homes therefore consider it is appropriate for these two scenarios to be discounted.
- 6.8 Scenarios D, E, F and G apply different jobs growth assumptions. The EDHNA recognises that the *"jobs projections, modelled in PopGroup, suggest that there would have to be an uplift to the demographic baseline if the employment growth /policy-on forecasts are to be realised, ranging from 435 dpa (Scenario D CE Economic Forecasts) to 683 dpa (Scenario F Past Trends Jobs Growth). These equate to between 489 dpa and 746 dpa incorporating PCU rates."* Options D to G are the only options to require a level of housing growth similar or higher than the those set out in the current Plan for Stafford Borough.
- 6.9 Lovell Homes agrees there is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment. In addition, if the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing. Jobs growth and housing growth are intrinsically linked and should be balanced to ensure a sustainable strategy to 2040.
- 6.10 Scenario D utilises the CE Baseline and represents a level of jobs growth that is significantly lower than past trends in jobs growth in the Borough and does not reflect the Council's future growth aspirations. Lovell Homes consider that this should therefore be discounted.
- 6.11 Scenario E assumes the delivery of a new Garden Community which would attract £750k of Government funding to develop detailed plans for key infrastructure such as highway improvements, schools, water and energy provision. It also assumes delivery of a major development proposal at Stafford Station. In total these proposals are assumed to create an additional 12,500 new jobs in the Borough. If both a Garden Community and the Stafford Station Gateway projects are pursued it is considered appropriate to utilise this scenario as an absolute minimum to guide

the housing requirement. Despite this, jobs growth should also be considered beyond a Garden Community and the county town of Stafford.

- 6.12 Scenario F reflects the jobs growth that has been experienced within Stafford Borough in the past (2000 to 2018). The EDHNA concludes that *"it is considered, given the current economic climate, that this rate of jobs growth is unlikely and would not be able to be sustained over the Plan Period. It is recognised that the current period is one of considerable economic uncertainty, in part as a result of Brexit, and that this may change, leading to more favourable economic conditions."* Lovell Homes would disagree with this conclusion on the basis that past jobs growth included a significant period of economic uncertainty, namely a prolonged recession, and fails to take account of the 12,500 additional jobs that could be created through the Stafford Station Gateway and a new Garden Community contained within Scenario E.
- 6.13 Scenario G (CE Baseline + 50% scenario) considers an intermediate level of jobs growth between Scenario D and Scenario F, "reflective of jobs growth associated with the development of Stafford Station Gateway but not including jobs associated with a potential New Garden Community development." This scenario appears arbitrary in assuming that the Council's economic growth aspirations will not be met without a Garden Community and that any growth over and above the baseline would only be attributable to Stafford Station Gateway. Lovell Homes considers this approach to be flawed.
- 6.14 Lovell Homes considers that the most appropriate Scenarios are Scenario E and F. Scenario E should be utilised as an absolute minimum if a Garden Community proposal were to be pursued. In addition, Lovell Homes considers that a level of economic growth that reflects past trends jobs growth is achievable over the plan period.
- 6.15 Lovell Homes would also support the inclusion of partial catch-up rates in respect of headship rates, to ensure that household formation rates suppressed in the past are rebalanced looking to the future.

Question 5.C: In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid 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 explain your reasoning.

- 6.16 The Housing Requirement figure for the New Local Plan should be expressed as a total figure without discount as the New Local Plan will replace the current Plan for Stafford Borough.
- 6.17 It is logical that existing uncommitted allocations or other sites relied upon to deliver homes by 2031 may contribute to this housing requirement. However, any existing site that is to be relied upon should be subject to the same scrutiny and assessment as any other 'reasonable option' being promoted through the Local Plan Review process. Any site deemed to be available, suitable and achievable and determined to be deliverable or developable should then inform a Borough wide trajectory for the period 2020-2040.
- 6.18 Through the Local Plan Review it is considered essential to review all sources of housing supply, including existing commitments. Whilst it is recognised that the Plan for Stafford Borough was only completed in 2017, further information or evidence may have arisen since adoption that raises questions of suitability or delivery of sites allocated.
- 6.19 All potential sources of supply should be scrutinised through the Local Plan Examination in Public, especially non-allocated windfall sites, and it is recommended that a site-specific housing trajectory is prepared to support the Preferred Options consultation. This should provide delivery assumptions in respect of any proposed preferred option allocation i.e. build out rates and lead in times.
- 6.20 If sites currently relied upon for delivery prior to 2031 no longer represent a deliverable or developable proposition or there are more appropriate alternatives in line with a new spatial development strategy, they should be removed from the supply and the emerging Local Plan as appropriate.
- 6.21 Lovell Homes consider that it is highly unlikely that a future supply of 6,000 homes can be demonstrated in Stafford Borough to 2031 through existing planning commitments and uncommitted allocations.

Question 5.D: Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy? Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

- 6.22 Lovell Homes support the emerging Settlement Hierarchy which identifies Stafford as the Tier 1 settlement. This reflects Stafford's position as the largest settlement within the Borough and its regional significance as a service centre providing employment, retail and other facilities.
- 6.23 Lovell Homes has no particular view in respect of including the Tier 6 'Smaller Settlements' however, inclusion within the settlement hierarchy should not, in itself, result in such settlements being afforded growth requirements through a spatial development strategy. Development growth should be focused to the most sustainable settlements within the Borough.

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?

- 6.24 Again, whilst Lovell Homes has no particular view on whether built-up areas to the north of the Borough should be included within the settlement hierarchy, inclusion in itself, should not determine whether these areas should form part of the spatial development strategy for delivering growth. Development within this area should have regard to any cross-boundary requirements related to Stoke-on-Trent and Newcastle-under-Lyme in particular.

Question 5.F: In respect of these potential scenarios do you consider that all reasonable options have been proposed? If not, what alternatives would you suggest? Are there any of these spatial scenarios that you feel we should avoid? If so, why? Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer.

- 6.25 Lovell Homes considers that all reasonable potential spatial scenarios have been identified, however it is recognised that some of these options are not mutually exclusive. In addition, it is considered that the Garden Communities scenario and Intensification of Town and District Centres are not appropriate to be pursued in isolation.
- 6.26 It is important that a range of sites across a wide geographical area would provide greater certainty for delivery. Lovell Homes considers that the spatial distribution of growth should be driven by sustainability and the existing settlement hierarchy

where possible support the creation of sustainable communities. Lovell Homes would therefore recommend the inclusion of strategic extensions to Stafford complimented by growth at other larger settlements.

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

- 6.27 The NPPF recognises that planning for larger scale developments such as new settlements or significant extensions to existing towns may be the best way to achieve future supply, provided it is well designed, located and provided with the necessary infrastructure and facilities.
- 6.28 However, there are a number of disbenefits associated with the seven options identified by the Council, particularly in respect of deliverability.
- 6.29 Modest urban extensions (up to approx. 1,500 new homes) to existing top tier settlements have the benefit of making best use of existing infrastructure present. Whilst Lovell Homes recognises that further infrastructure will be required to support the delivery of modest extensions to mitigate any impacts, a new settlement/significant extension of the scale proposed by the seven options would require the delivery of all significant new infrastructure, delivered in a timely manner, to ensure a level of self-containment and sustainability. The Greater Birmingham HMA Strategic Growth Study sets out a number of social and community infrastructure assumptions for new towns/settlements which may be relevant, as follows:
- *"mixed-tenure home and housing types;*
 - *employment land provision sufficient to meet aspiration of self-containment;*
 - *include integrated health care practice or practices;*
 - *include provision of primary school(s) and secondary school;*

- *include provision of local centres to meet everyday convenience shopping needs and provision of 'town centre' incorporating a range of comparison and convenience stores;*
- *provide facilities for community/cultural activities;*
- *uses zero-carbon and energy-positive technologies;*
- *provide coordinated recreational and sporting facilities (including a swimming pool) that meet the needs of the development;*
- *delivery of comprehensive green infrastructure within the new settlement."*

6.30 All of the seven options relate to lower tier settlements or rural locations that cannot make best use of existing infrastructure. Pursuing development in these locations would require the reliance on external grant funding to demonstrate deliverability and would need to be rigorously tested through a viability assessment prepared as part of the plan-making process.

6.31 It is also questioned whether a number of the options identified would result in the creation of sustainable communities. For example, it is unlikely that options resulting in less than 5,000 homes would be capable of supporting the provision of a secondary school.

6.32 In addition, reliance on such significant options would result in long lead in times of a minimum of 5-10 years and increased uncertainty related to delivery assumptions due to potential market saturation. The number of homes that could be delivered in any location will be finite and Lovell Homes consider that the larger options would result in build-out periods that stretch way beyond the end of the Plan period in 2040.

Question 5.H: Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community/Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)? If you do not agree, what is your reasoning? 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.

- 6.33 Lovell Homes considers that Growth Options 1 and 2 could be compliant with the NPPF where development in the smaller villages is supported through the preparation of Neighbourhood Plans, which would form part of the development plan for an area.
- 6.34 Options 1 and 2 would ensure development is focused to the most sustainable locations within the Borough, including Stafford, and would result in new development being able to make best use of existing infrastructure available. Option 2 would also allow for a range of sites to be identified within the Local Plan across a wide geographical area. This would be further increased through the support of local communities in the preparation of Neighbourhood Development Plans where local, organic growth would be supported.
- 6.35 Option 3 would disperse development to smaller settlements that do not contain the level of services and facilities necessary to support sustainable travel patterns and communities. Lovell Homes consider that these less sustainable settlements should not be relied upon to deliver the Borough's growth requirements, but such communities should be allowed to support local growth through the provision of Neighbourhood Development Plans.
- 6.36 Option 5 replicates Option 3 with the additional inclusion of a new Garden Community. Lovell Homes consider that development should not be relied upon within the smaller, less sustainable settlements and that a cautious approach should be taken in respect of the delivery of a Garden Community/Significant Extension for the reasons outlined above.
- 6.37 Option 6 seeks to maximise the benefit of the existing transport network and other infrastructure, however, Lovell Homes agree that this is likely to lead to undesirable ribbon development. If this Option were to be pursued, it would be necessary to ensure that development is still focused to the most sustainable settlements within the Borough along these identified corridors.
- 6.38 Lovell Homes consider the most appropriate and balanced approach to distributing growth to be an amended Option 2 to allow additional growth in smaller settlements where this is supported by a local community through the progression of a Neighbourhood Development Plan. It is considered that this approach would comply with the NPPF.

Question 5.I: Do you think that it is appropriate, in order to take the development pressures 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.

6.39 With regard to the delivery of at least one Garden Community, Lovell Homes considers this would have a number of disbenefits including requiring significant investment in new infrastructure, relying on long lead in times of a minimum of 5-10 years and increased uncertainty related to delivery assumptions due to potential market saturation. Therefore, it is contended that any proposed spatial strategy should not be heavily reliant upon the delivery of new Garden Communities. With reference to our comments set out above in respect of the housing requirement scenarios, and the potential for the Borough to accommodate increased housing numbers to 2040, it is clear that there is scope for a wide range of sites geographically spread across the Borough in accordance with the settlement hierarchy, without the need to rely on the possible inclusion of a Garden Community.

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

- 1. Growth Options Scenario (A, D, E, F, G)**
- 2. Partial Catch Up**
- 3. Discount/No discount**
- 4. No Garden Community/Major Urban Extension**

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

6.40 In light of the economic growth aspirations of the Borough and the affordable housing need, Lovell Homes considers the Growth Options Scenario is the most appropriate option.

6.41 Lovell Homes supports the approach to partial catch-up in respect of headship rates to ensure past household suppression is not forecast into the future.

6.42 Lovell Homes recognises that a committed supply of housing land will play a role in meeting the housing requirement between 2020 and 2040, however it will be necessary for the Council to ensure robust scrutiny of this supply and subject any

uncommitted housing allocation to the same assessment as alternative site options through the plan-making process.

- 6.43 Lovell Homes does not consider it is necessary for the Council to rely on the delivery of a new Garden Community to meet an appropriate housing requirement for the District. If a Garden Community is incorporated within the spatial development strategy further flexibility should be provided within the planned supply to take account of the increased risks of delivery.

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.

- 6.44 Lovell Homes agrees with an assumption being incorporated within the EDHNA to take account of future losses of employment land.

Question 5.M: Should the New Plan broadly mirror the spatial distribution of new employment prescribed by the current Plan? If not, what would you suggest and on what basis?

- 6.45 Lovell Homes consider housing growth and jobs growth are intrinsically linked. To ensure balanced and sustainable communities, housing growth should be focused to locations where job opportunities are present, having regard to not only planned employment allocations, but existing employment generating uses. This is likely to be reflected by the proposed settlement hierarchy where Stafford is identified as the Tier 1 town.

Question 5.O: Are there any 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.

- 6.46 Lovell Homes has submitted information in respect of land The Crescent, Doxey, Stafford, through the "Call for Sites" process.

7. DELIVERING HOUSING

- 7.1 Section 8 of the consultation document considers housing delivery, recognising that the provision of a housing market which reflects the needs of all members of the community is a key objective of plan making.
- 7.2 Lovell Homes seeks to raise a number of views in respect of housing delivery which are intended to be helpful in guiding policy.

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

- 7.3 Whilst the NPPF at paragraph 117 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 or 'brownfield' land*" it falls short of requiring a brownfield first policy. The plan-making process must recognise the importance of identifying greenfield sites to ensure an appropriate housing requirement can be met within the Plan period and to ensure the Local Plan is deliverable. This is highlighted by the Council's Brownfield Register which identifies brownfield sites that could yield approximately 800 dwellings, noting that these are all consented.

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

- 7.4 Lovell Homes supports the efficient use of land, in accordance with National Planning Policy and Guidance, however, the introduction of a Borough-wide minimum density standard is not supported. Instead, it is necessary for sites to be considered on a site-by-site basis, having regard to local character, context and other planning policy requirements or environmental designations or constraints.
- 7.5 As Stafford Borough is very diverse in terms of housing density across the Borough it is therefore considered that if density standards are incorporated within the Local Plan Review, then these should be minimum standards determined by reference to the character of the local area and the housing mix as determined by local needs. In accordance with national guidance the Council may wish to consider a variety of density standards for different locations.

7.6 Nevertheless, due to the size of the site at The Crescent, Stafford and the lack of identified constraints, it is realistic to expect the delivery of an efficient scheme that could achieve a minimum net density of 35-40dph.

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

7.7 Lovell Homes recognise that it may be appropriate to adopt a higher minimum density within town centre locations, where the opportunities to access sustainable travel options is most prevalent.

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?

7.8 Lovell Homes provides a range of dwelling types to assist in the provision of attractive and sustainable developments and to assist in contributing towards a balanced housing market.

7.9 These dwelling types have been derived from vast experience of delivering homes within the housing market area. This has been informed by careful consideration of customer feedback in respect of household living requirements, affordability, design criteria, current regulations and the requirements identified by Registered Providers.

7.10 The portfolio of housetypes is considered to provide for inclusivity, accessibility, adaptability, sustainability and offer good value. The accommodation provides the following elements to support the changing needs of individuals and families at different stages of life:

- The approach to all entrances are capable of being provided at level or a gently sloping angle
- Movement in hallways and through doorways are convenient to the widest range of people, including those using mobility aids or wheelchairs, and those moving furniture or other objects.
- Space is provided for turning a wheelchair in dining areas and living rooms and basic circulation space for wheelchair users is provided elsewhere.

- A living room/living space is provided on the entrance level of every dwelling
- All housetypes contain a W/C facility (as a minimum) at ground floor level
- Walls in all bathrooms and WC compartments are capable of firm fixing and support for adaptations such as grab rails.
- Windows in the principal living space (typically the living room), allow people to see out when seated. In addition, at least one opening light in each habitable room is approachable and usable by a wide range of people – including those with restricted movement and reach

7.11 Lovell Homes consider their offer within Stafford Borough would enhance the health and wellbeing of new residents and the introduction of the NDSS would represent an arbitrary constraint on delivering a high quality and optimal scheme for a site.

7.12 The acceptability of dwelling design and provision of internal spaces should therefore be considered on a site-by-site basis.

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?

7.13 Lovell Homes therefore maintain a position that the acceptability of dwelling design and provision of external spaces should be considered on a site-by-site basis.

7.14 The NDSS was published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.

7.15 In introducing the standards, the Written Ministerial Statement outlines:

'New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards

for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes.'

- 7.16 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

'From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy.'

- 7.17 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

'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 National Planning Policy Framework and Planning Guidance.'

- 7.18 The reference to the National Planning Policy Framework relates to paragraph 174 which states:

'Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.'

- 7.19 The reference to the National Planning Guidance relates to the following:

'Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.'*

7.20 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability. If the Council were to consider introducing such a requirement, further evidence is necessary.

7.21 Regarding need, no justification or evidence is provided and until it is the NDSS should not be applied to any site on the premise it would be unsound. Lovell Homes consider there is unlikely to be any local circumstances within Stafford Borough that would support such an imposition of the Nationally Described Space Standards (NDSS).

7.22 Regarding viability, there is an intrinsic link between the affordability of a property and its size (in floorspace) typically expressed as a cost (£) per square metre (or square foot). Should the NDSS be implemented within Stafford Borough, the building costs would increase, and these additional costs would be offset by the increase in market value, estimated to be in the order of 10%.

7.23 Therefore, artificially increasing the floor area of properties to achieve NDSS standards would serve the purpose of 'pricing out' a number of potential purchasers that have a current housing need. This is despite local evidence justifying a significant affordability issue being present within the Borough.

- 7.24 The imposition of NDSS should not be required on any site unless it is further justified on grounds of viability.

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?

- 7.25 Lovell Homes considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan Period. This ensures that housing mix is reflective of market-driven need.
- 7.26 Lovell Homes does however recognise the recommended range provides a good level of flexibility to allow for changing market signals across the Plan period and in different locations within the Borough. It is therefore considered sufficient in terms of ensuring the needs of all members of the community can be met.

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?

- 7.27 Lovell Homes considers the existing housing stock within Stafford to be balanced however recognises the current demand for smaller 2 and 3 bed properties across the Borough.

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

- 7.28 If the Council wishes to adopt the higher optional standards for Part M Category 2 and 3 then this should only be done in accordance with the NPPF (para 127f & Footnote 46). The Written Ministerial Statement (WMS) dated 25th March 2015 stated 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.*" Lovell Homes considers that this suggested policy requirement has not been justified by the evidence base available at present.

Question 8.I: 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? Should the amount of land required for such bungalows be reduced be either limiting their garden size or encouraging communal/shared gardens? Is there a need for bungalows to be delivered in both urban and rural areas? Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?

7.29 It is considered that the need to deliver specialist housing, including bungalows, should be guided by demand and market signals, through an up-to-date evidence base. It would be inappropriate to impose a Borough-wide percentage provision for bungalows, the demand for which varies geographically.

7.30 If bungalows are to be provided within a scheme, it would seem logical to reduce garden sizes or allow for the provision of communal/shared gardens to ensure efficient use of land and to reflect any desire from the market for low-maintenance external amenity areas. This approach is also likely to align to any appropriate space about dwellings requirements which should reduce the necessary distance between principal facing windows for ground floor windows, where intervening boundary treatments would interrupt views.

Question 8.J: Do you consider that there is no need for additional provision of student accommodation within the Borough?

7.31 Lovell Homes has no view on whether additional provision for student accommodation is required, however, any provision should not contribute towards the annual housing requirement.

Question 8.K: Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable? 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?

7.32 The level of affordable housing provision that is achievable will be intrinsically linked to the annual housing requirement established through the Local Plan review and overall plan viability having regard to all other policy requirements sought.

7.33 Utilising the highest annual requirement of 746 dwellings per annum set out in Scenario F, the affordable housing requirement would represent between 34% and 52% of all homes delivered. Based upon the annual housing requirements set out

through the EDHNA, Lovell Homes consider that an affordable housing provision of 389 per annum is unachievable. It is also relevant that the highest level of annual affordable homes delivered within the Borough through the current Plan period equated to 343 dwellings in 2016/17 based on a total of 1,010 dwellings (34% of all completions).

- 7.34 Lovell Homes is of the opinion that a target of 252 affordable homes per annum is only like to be achievable if a housing requirement in line with Scenario F, as a minimum, is pursued. This would require a continuation of an affordable housing requirement of between 30% and 40% on qualifying sites and this would need to be balanced with other policy requests through an assessment of viability.

Question 8.L: Should the Council require affordable units to be delivered on sites with a capacity of less than 5 units in designated rural areas?

- 7.35 No comment.

Question 8.M: In order to help maintain the potential supply of land for rural affordable housing should the Council, where development has not yet commenced, convert existing Rural Exception Site Planning Permissions to Rural Affordable Housing Site Allocations?

- 7.36 The NPPF defines Rural Exception Sites as "*small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.*" As these sites represent sites that would not normally be used for housing, in the large part due to the sustainability of locations, and represent sites that should not be relied upon in meeting the overall housing requirement, Lovell Homes consider an approach to convert these permissions to site allocations through the Local Plan to be unsound. The suitability and deliverability of these unimplemented permissions should be subject to the same level of scrutiny and assessment as all other reasonable sites contained within the SHELAA, having regard to the spatial development strategy.

Question 8.N: 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?

Should the Council allocate plots for the purpose of self-build throughout the Borough?

- 7.37 In terms of the requirement for all major housing development proposals to provide evidence that they have fully considered the provision of self/ custom build within the overall housing mix on site, from an urban design/ masterplanning perspective, the integration of a number of self builds into a scheme being delivered by a volume housebuilder (that often work on standard house types) would possibly be difficult to achieve in respect of both making an efficient use of land; and to achieve design consistency. Further, sites currently being put forward by developers have been negotiated on the basis of existing planning policies and values and such an addition could impact on viability. It is recommended that further work be commissioned in order to find out where households would like to have the opportunity to undertake a self and custom build, so that the planning policies can better provide for the need rather than simply asking developers of all large sites to offer land.
- 7.38 In addition, the Council's own evidence base does not appear to fully justify a need for self/custom build properties to be considered on all sites over 100 dwellings. In October 2019 only 45 people had registered. This evidence does not support the Council's suggested approach.
- 7.39 A key priority of the Government is to boost the supply of housing by a variety of means to meet the varied housing needs of people across the UK. Self-build and custom housebuilding have been identified as a significant element of the Government's agenda to increase housing supply. The NPPF gives explicit support to policies which would plan for a mix of housing based on the needs of different groups in the community, including people wishing to commission or build their own homes. In addition, paragraph 61 of the NPPF sets out that Local Planning Authorities (LPAs) have a duty to assess the local demand for self-build plots and must also make provision for that demand.
- 7.40 With regard to facilitating the provision of self-build and custom build housing within Stafford Borough, the identification of specific sites for such development is favoured, as this option would have a greater chance of ensuring that the needs of local people wishing to build their own homes are met. It is recommended that these sites are specifically allocated as self-build/custom build housing sites within the Local Plan Review document.

Question 8.0: Do you consider that the approach detailed above will be beneficial to the smaller settlements of the Borough of Stafford and their residents? 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?

7.41 No comment.

8. DELIVERING QUALITY DEVELOPMENT

- 8.1 Section 9 of the consultation document relates to the quality of development. Lovell Homes seeks to provide views in respect of blue and green infrastructure, landscape and general design guidance.

Question 9.A: Should the Council have a separate policy that addresses Green and Blue Infrastructure? Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?

- 8.2 The importance of green and blue infrastructure is, unquestionably, important in delivering good design and ensuring that it reaches beyond the site linking to areas beyond. However, caution should be exercised in being too prescriptive as sites and their contexts will vary. Notwithstanding this, it is important that opportunities for linkages are maximised and clearly articulated, through an evidence-based approach which is then clearly shown on a policies map to provide certainty. This should include a review of existing Green Infrastructure to ensure such land continues to perform a meaningful role/function whilst providing public benefit. For example, there may be sites currently identified as Green Infrastructure but have no corresponding benefits for the public given they are in private ownership with no public access. Such sites cannot perform a meaningful role as Green Infrastructure.

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 team?

- 8.3 Policies must be prepared in conformity with the NPPF, paragraph 174 which states that plans should:
- A. identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation and;
 - B. promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and

identify and pursue opportunities for securing measurable net gains for biodiversity.

Question 9.C: Should the new Local Plan continue to protect all designated sites from development, including maintaining a buffer zone where appropriate? Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancements? Require, through policy, increased long-term monitoring of biodiversity mitigation and enhancement measures on development sites?

- 8.4 Paragraph 175 of the NPPF sets out the approach for considering planning applications in the context of habitats and biodiversity so the Local Plan must conform to this. It should be borne in mind that well designed developments can enhance biodiversity so the policy should contain wording which allows this to happen.

Question 9.D: How should plan policies have regard to the new AONB Management Plan and Design Guidance?

- 8.5 Where relevant, the Local Plan should contain a clear hook to the AONB Management Plan. However, the Management Plan has a different legal status, therefore any policies which are to be drawn through which would be used in the setting of Local Plan policy or used as a material consideration in the determination of planning applications should be made very clear so that they can be consulted upon through the Local Plan process.

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

- 8.6 This approach is supported.

Question 9.F: Should the Council consider a policy requirement that new development take an active role in securing new food growing spaces? 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.**

8.7 This approach is supported in principle but should not be used to preclude or block development, but to help inform good design which incorporates applicable elements as set out above. Furthermore, monitoring will be essential as evidence of demand will be needed to inform local specifics for example whether there is need for allotments (local waiting lists or underused plots for instance).

Question 9.G: Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting?

8.8 Provided that the context is clearly justified it would be sensible and appropriate to include positively worded policies which would require an LVIA to accompany and inform development proposals.

Question 9.H: Do you consider there are areas in the Borough that should have the designation of Special Landscape Area? If so, explain where.

8.9 Recent case law has considered the issue of landscape value and what it means for a landscape to be valued. *Stroud DC vs. SSCLG [2015] EWHC 488 (Admin)* is clear that, whilst valued landscapes do not need to have a formal designation, 'valued' means something more than just 'popular'. Landscape is only 'valued' if it has physical attributes which take it out of the ordinary.

8.10 The Landscape Institutes' Guidelines for Landscape and Visual Impact Assessment ('the GLVIA') identifies various factors that may be relevant in the assessment of landscape value, including:

- Condition/Quality,
- Scenic Quality,
- Rarity and Representativeness,
- Conservation Interests,

- Recreation Value,
- Perceptual Aspects; and
- Cultural Associations.

8.11 Lovell Homes considers that further evidence is required if further designations are sought to determine landscape is 'special' or 'valued'. This should be evidenced having regard to the above criteria.

Question 9.J: Do you consider that the current "Design" SPD provides sufficient guidance for design issues in the Borough? Please explain your rationale.

8.12 The Design SPD is considered to provide sufficient guidance however, Lovell Homes considers this should be updated to reflect the National Design Guide, published in October 2019.

Question 9.L: To support a new Local Design Review Panel should the new Local Plan:

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

8.13 Lovell Homes considers if particular standards are already required at the national level there is no need to reiterate them locally as it is better to refer to them via a general policy hook, which would then be more flexible if the national context changes.

8.14 In relation to design and sustainability standards, it is acknowledged that the Code for Sustainable Homes has been withdrawn by the UK Government. However, it is noted that the BREEAM sustainability assessment can still be used, for new

residential, as well as other buildings. In light of the fact that there is no mandatory requirement for many of the identified standards it is considered that this should be left to the discretion of the developer, rather than included within local planning policy. Indeed, as Paragraph 150 b) of the NPPF states, any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Question 9.M: Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?

- 8.15 Lovell Homes considers that it is not necessary to designate Local Green Spaces through the new Local Plan. As these spaces are "*green areas of particular importance to local communities*" (ID: 37-005) it may be more appropriate to allow identification through the Neighbourhood Planning process.
- 8.16 In determining Local Green Spaces, regard must be had to the spatial development strategy to ensure they would not undermine the Local Plan's aim to "identify sufficient land in suitable locations to meet identified development needs" (ID: 37-007).

Question 9.N: Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so where? Are there any other Borough-wide facilities you feel should be associated with open space? Are there any settlements that you believe are lacking in any open space provision? Should the Council seek to apply Play England standards to new housing developments? Should the Council seek to apply Fields in Trust standard to providing sports and children's facilities? Should the Council seek to apply Natural England's ANGSt to new development? Should the Council seek to develop a bespoke standard in relation to open and/or play space? Do you consider that developments over 100 houses should incorporate features that encourage an active lifestyle for local residents and visitors? Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure? Should the Council require all high density schemes to provide communal garden space?

- 8.17 Lovell Homes considers that policy must be capable of being flexible to support the local context. Thresholds seem rather arbitrary and therefore Lovell Homes suggest it would be more appropriate to ensure that developments are prepared in line with

a design framework; one which references good practice and guidance which may well be subject to change throughout the Plan period.

Question 9.0: Should the Council seek to designate land within the new Local Plan 2020-2040 to address Borough-wide shortage of new sporting facilities? Identify within the new Local Plan the site in which a new swimming pool should be developed?

- 8.18 Lovell Homes consider policies will need to demonstrate to be deliverable, and any future requirements will need to be justified in order to provide certainty in terms of compliance with Regulation 122 of the CIL Regulations and the need for developer contributions should these be required. Further evidence will be required in respect of new sporting facilities as the plan progresses and this should be informed by any corporate strategy prepared by the Borough Council.

9. ENVIRONMENTAL QUALITY

9.1 Chapter 10 focuses upon environmental quality including air quality, noise and light pollution, and the management of waste.

Question 10.A: The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the Council:

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

9.2 In terms of ensuring the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles, it is considered that more evidence is required. Whilst the principle is supported by Lovell Homes, and local plan policies can provide the context for supporting such change, this will also depend on further detail: for example is the infrastructure appropriate; can the grid support capacity in the area being developed; and, what is the impact upon viability and deliverability?

9.3 In terms of Air Quality Management Zones, again it is considered that further evidence is required. This evidence should consider the potential impact upon sites of biodiversity (given that these will vary) and whether such zones would achieve proposed outcomes.

Question 10.B: The currently adopted Plan for Stafford Borough does not enforce any policy to mitigate for the impact 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?

9.4 Again, Lovell Homes consider further evidence is required to show what the impact is likely to be and whether this impact arises as a consequence of proposed development (in order to justify the need for mitigation). Any mitigation strategy would also need to consider the effect upon Plan viability.

Question 10.C: The currently adopted Plan for Stafford Borough makes reference to waste management in Policy N2. However, the growing population of Stafford Borough and the need for further action to combat climate change suggests the employment of further, more stringent measures encouraging sustainable waste disposal is desirable. Therefore, should the Council:

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

9.5 Lovell Homes considers that much more detail is required, particularly as this potentially overlaps with the role of the County Council and the Waste Local Plan. The current Waste Local Plan, covering the period 2010 - 2026 was adopted in 2013 and was reviewed in 2018. It is due for a further review in 2023, 'unless an earlier review is deemed necessary due to significant changes in national policy and guidance, local circumstances or our strategic priorities'. The new Local Plan for Stafford Borough needs to ensure it is conformity with the Waste Local Plan otherwise considerable confusion and uncertainty will arise.

10. LAND AT THE CRESCENT, DOXEY, STAFFORD

- 10.1 Lovell Homes has an interest in approximately 3.1 hectares of land to the north of Doxey in Stafford, occupying an area of land between existing residential development to the south at The Crescent and the West Coast Railway Line to the north. The residential properties at The Crescent and Chetney Close define the boundary to the south of the site and the railway line and floodplain associated with the River Sow define the northern boundary.
- 10.2 The site lies within site reference: DOX01 as identified within the Borough Council's Strategic Housing & Employment Land Availability Assessment (SHELAA) most recently published in 2019.
- 10.3 The emerging proposals are set out in the accompanying Promotional Document attached at **Appendix 2** to this representation. The Promotional Document brings together the findings of the initial technical and environmental studies which have informed initial masterplanning proposals for land at The Crescent, Doxey, Stafford. The proposal, in summary, is set out below:

Land at The Crescent, Doxey, Stafford

- 10.4 Land at The Crescent, Doxey, Stafford is located approximately 1.3 km to the west of Stafford Town Centre and 1.3km from Stafford Railway Station located to the south east of the site.
- 10.5 The site is bounded by the West Coast Main Railway Line along the north-east of the site. Residential development at The Crescent and Chetney Close is located directly to the south and south-west of the site. An area of open space, including a play area (The Crescent Play Area) is located directly to the south and west with Doxey Marshes, including the River Sow further to the north and west. Adjacent to the far eastern end of the site is a small extra care facility accessed via The Crescent.
- 10.6 The site is currently overgrown, comprises of mainly dense and continuous scrub. A number of hedges and immature trees are present with more established trees typically along the site's boundaries. The site also includes a large area of hardstanding situated in the west of the site, associated with its former use as a scrapyards. There is currently no public access to the site and it therefore serves no recreational value.

- 10.7 The site is sustainably located with Stafford town centre approximately 1.3km to the south east, which includes an extensive range of higher order services, facilities and employment opportunities.
- 10.8 Furthermore, the site is sustainably located in relation to public transport, located within walking distance of bus routes, and Stafford Railway Station located approximately 1.3km to the south east providing links with the major cities of Birmingham, Wolverhampton, Manchester, Liverpool and London among others.
- 10.9 A large area of the site constitutes previously developed land located adjacent to the confines of the existing settlement boundary for Stafford (Doxey).
- 10.10 The initial Feasibility Layout demonstrates an opportunity to provide approximately 109 dwellings, including the provision of 55 affordable homes and 55 build-to-rent units, the provision of new areas of open space and new footpath connections to The Crescent and The Crescent Play Area which lies directly adjacent to the site's southern boundary. There will be areas of new soft landscaping and planting across the site and existing boundary vegetation will be retained where practical.
- 10.11 The development is proposed to be served from a single point of access achieved from Chetney Close which can be appropriately widened to incorporate paved footways to tie in with the development site. This access would be able to accommodate the vehicle movements from the new 109 dwellings and existing 8 dwelling along Chetney Close.
- 10.12 Key Principles include:
- Provision of 50% affordable housing and 50% built-to-rent, with a mix of 2, 3 and 4 bed properties;
 - A primary site access via Chetney Close;
 - A network of secondary streets and private drives serving residential properties;
 - Outward facing development providing natural surveillance over newly created public open space;
 - Public open space located to the northern end of the site to create an appropriate transition between the development and wider countryside and floodplain to the north;

- Green corridors providing foraging routes for wildlife and an enhanced ecology infrastructure to link in with wider local network;
- Cycle and pedestrian connections to Doxey Road, via The Crescent and Walland Grove;
- Walkable route to Doxey Primary School;
- Utilised site low points for sustainable urban drainage;
- Maximum retention of existing green vegetation and incorporation of Sustainable Drainage Systems (SuDS);
- Retained and improved boundary treatment along northern boundary to provide screening between the development and railway line; and
- Create new connections to The Crescent Play Area and opportunities for enhancements to Play Area via planning obligations.

Availability

10.13 The site is owned by a single private landowner. Lovell Homes has entered into an agreement with the landowner to promote the site for residential development with the option to acquire the site for development. The site is available and achievable.

Suitability

10.14 With regards to the suitability credentials of the site, it is located outside the current settlement boundary but adjacent to the sustainable settlement of Stafford and in proximity to public transport routes, services and facilities.

10.15 The most recent Strategic Housing and Economic Land Availability Assessment (SHELAA), published in 2019, considers that land at The Crescent, Doxey (site reference DOX01) as not being suitable.

10.16 However, Lovell Homes has commissioned a number of high-level technical studies to address the assumptions in the SHELAA and to demonstrate that this site is suitable for residential development.

10.17 The Flood Risk Assessments finds that the vast majority of the site is not within the floodplain, with only a small sliver of land along the boundary with the railway and an area in the northern corner of the site being within the floodplain. As

demonstrated on the Feasibility Layout, residential development can come forward on this site avoiding the areas subject to floodplain. This is therefore not a constraint to development.

- 10.18 The site is designated as Green Infrastructure on the Proposals Map for the Stafford Local Plan. A large part of the site constitutes previously developed land associated with its historic use as a scrapyards and the site is overgrown and unattractive. The site also serves no recreational value as there has never been any public access.
- 10.19 Whilst the site does have links to the wider ecological network, notably the Doxey Marshes SSSI to the north, this is not a constraint to development on this site given green corridors for foraging wildlife and an enhanced ecology infrastructure to link in with the wider local network could be provided as part of any development proposals.
- 10.20 The development proposals would significantly improve this underutilised and overgrown brownfield site, with the opportunity to create meaningful green and ecological links whilst providing new recreational benefits as part of the wider Green Infrastructure network in this area.
- 10.21 It is considered that matters such as landfill and ground contamination and the Historic Environment Record can be addressed through a well-designed scheme and appropriate mitigation measures within the site.
- 10.22 The findings of the various Technical Reports are summarised in the Promotional Document (**Appendix 2**). The site is suitable for development.

Summary

- 10.23 Land at The Crescent, Doxey, Stafford is a suitable and sustainable location for residential development and represents a deliverable proposition, being available now and providing every prospect that approximately 109 dwellings can be delivered. The suitability of the site is further detailed within the accompanying Promotional Document at **Appendix 2**. The proposal would make the best use of existing infrastructure and provides the opportunity to deliver new areas of open space, improvements to the local green infrastructure network and potential improvements to The Crescent Play Area.

11. CONCLUSION

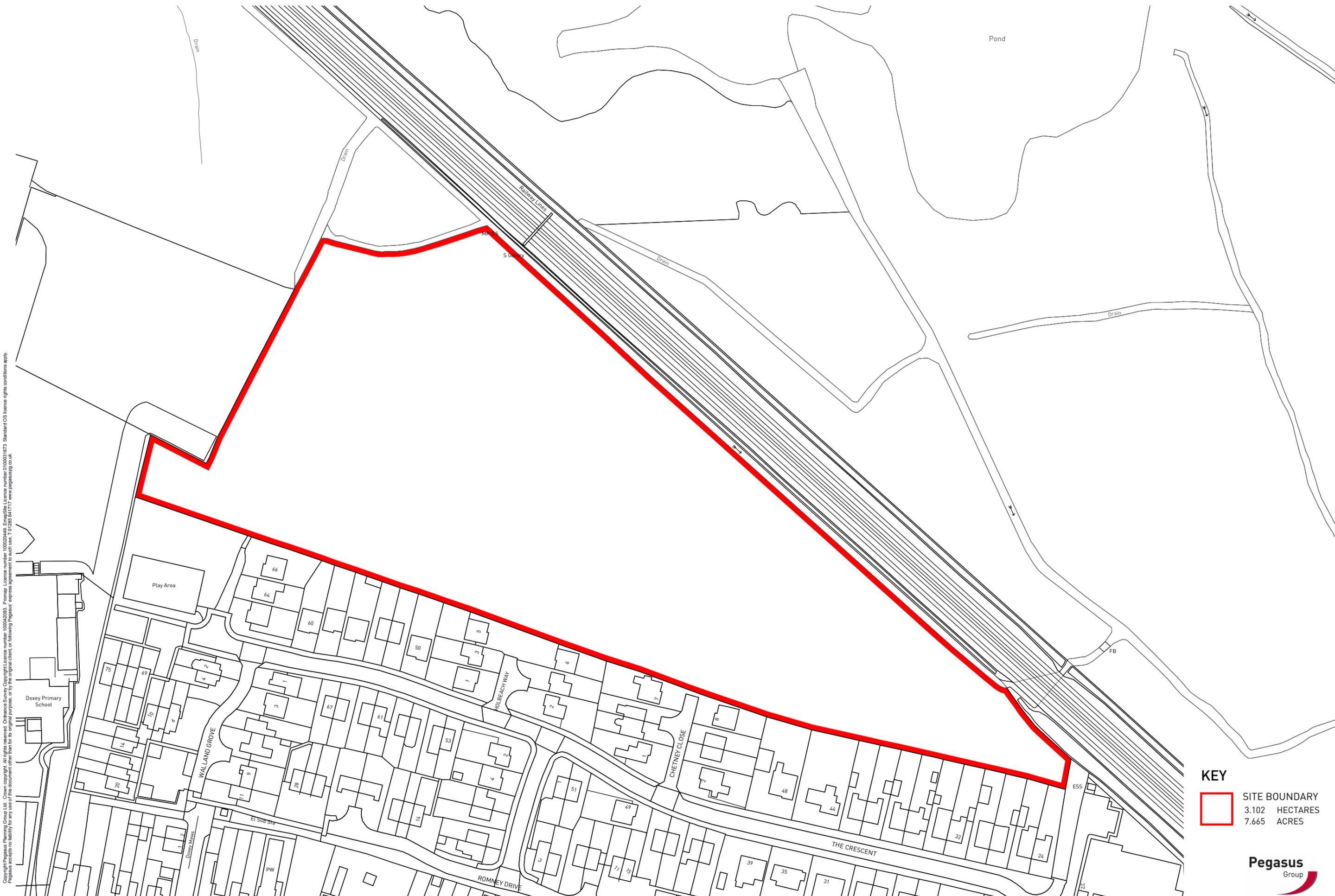
- 11.1 Lovell Homes supports Stafford Borough Council's decision to commence a review of the Local Plan. This provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 11.2 In respect of the vision and objectives, Lovell Homes considers that the review should seek to distil elements of the current vision and objectives that remain relevant to the Borough, into a concise overview of change sought to 2040.
- 11.3 In respect of emerging policy choices, it is recognised by Lovell Homes that further evidence will be required to support policy requirements and that elements of this further evidence will form an iterative part of the plan-making process to respond to the emerging growth requirements and spatial development strategy.
- 11.4 In respect of housing growth Lovell Homes considers Growth Option Scenario F is the most appropriate option. This scenario aligns to the economic growth aspirations of the Borough and the affordable housing need set out in the EDHNA. As part of this requirement Lovell Homes supports the approach to a partial catch-up in respect of headship rates to ensure past household suppression is not forecast into the future.
- 11.5 Lovell Homes recognises that an existing committed supply of housing land will play a role in meeting the housing requirement between 2020 and 2040, however it will be necessary for the Council to ensure robust scrutiny of this supply and subject any uncommitted housing allocation to the same assessment as alternative site options through the plan-making process.
- 11.6 Lovell Homes does not consider it is necessary for the Council to rely on the delivery of a new Garden Community to meet an appropriate housing requirement for the Borough. If a Garden Community is incorporated within the spatial development strategy further flexibility should be provided within the planned supply to take account of the increased risks of delivery. As such Lovell Homes supports the pursuit of Growth Option 2 as the most appropriate distribution of housing growth to 2040, with an amendment to allow communities to bring forward additional growth where this would be supported locally through a Neighbourhood Development Plan. This approach would ensure all communities have the ability to meet housing needs in line with national guidance.

11.7 Land at The Crescent, Doxey, Stafford is promoted by Lovell Homes as a suitable and sustainable location for residential development, representing a deliverable proposition, being available now and providing every prospect that approximately 109 dwellings can be delivered. The site is aligned to the various spatial development strategy options being considered by the Borough Council and would assist in delivering an appropriate housing requirement and supporting the economic aspirations of the Borough.

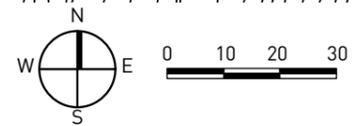
APPENDIX 1

SITE LOCATION PLAN

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KEY
SITE BOUNDARY
3.102 HECTARES
7.665 ACRES



LAND OF THE CRESCENT, DOXEY, STAFFORD | SITE LOCATION PLAN

APPENDIX 2

PROMOTIONAL DOCUMENT



LAND AT THE CRESCENT, DOXEY, STAFFORD



PROMOTIONAL DOCUMENT

Prepared by Pegasus Group on behalf of Lovell Homes

April 2020 | P18-1821



CONTENTS

PAGE 3	1	PAGE 4	2	PAGE 7	3	PAGE 11	4	PAGE 14	5	PAGE 25	6
INTRODUCTION		PLANNING POLICY CONTEXT		THE SITE		THE PROPOSED DEVELOPMENT		TECHNICAL CONSIDERATIONS		CONCLUSIONS	

INTRODUCTION

INTRODUCTION

- 1.1 The land at The Crescent, Doxey, Stafford represents a logical and appropriate extension to the County Town of Stafford. The site is sustainable, is well located to a wide range of existing services and facilities and offers an opportunity to deliver new homes alongside supporting infrastructure.

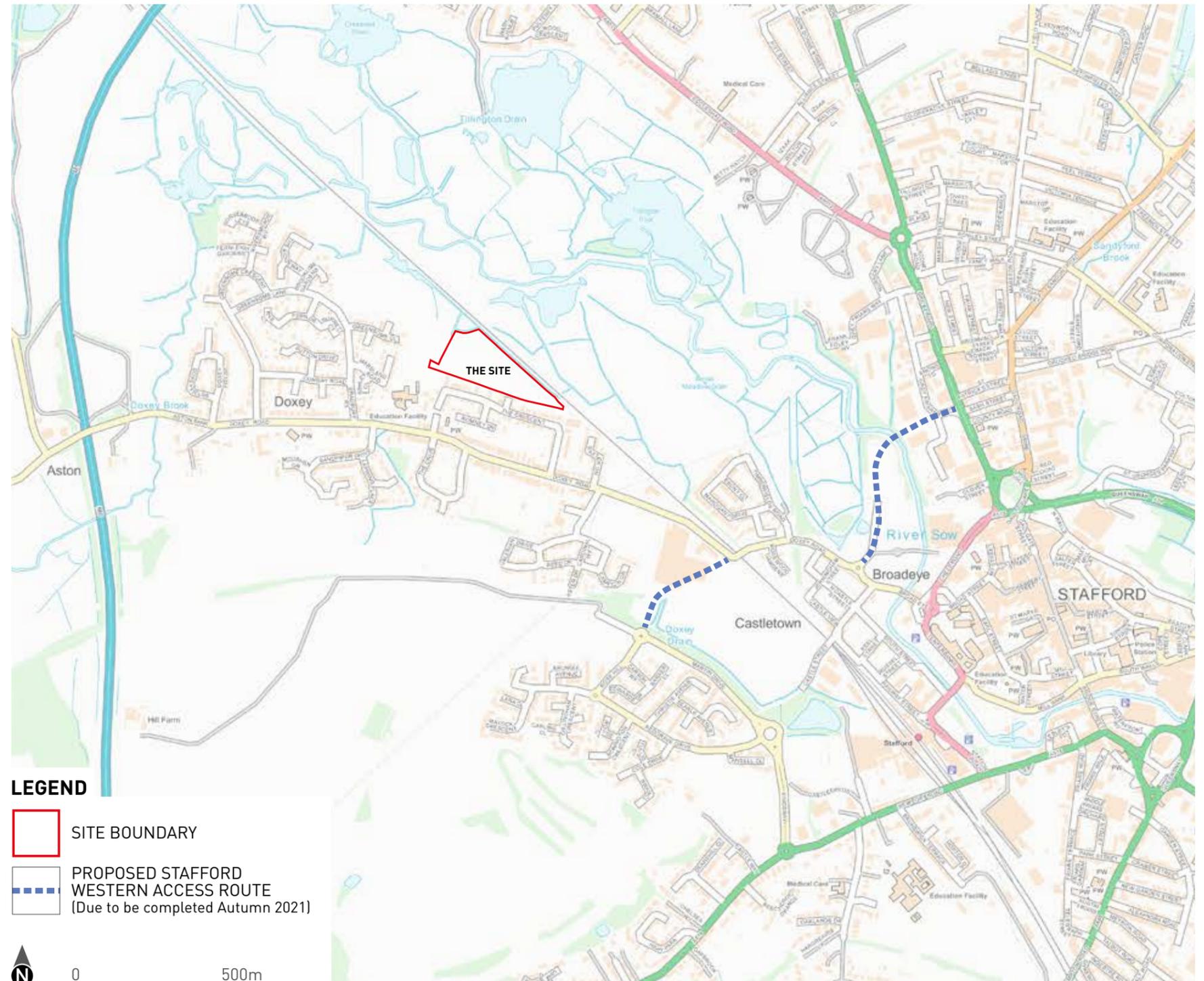
LOVELL HOMES

- 1.2 Lovell is a leading provider of partnership housing. The company has expertise in housing-led regeneration including new-build, open market housing, refurbishment and planned maintenance. Lovell has over 40 years' experience in partnership housing.
- 1.3 Lovell has extensive experience in market sales projects, both nationally and regionally. Lovell have worked in many different areas, with differing requirements, market demands and demographics and have learnt how to develop a market sale scheme and produce, in each of those localities which meet the specific requirements.

DOCUMENT PURPOSE

- 1.4 Stafford Borough Council ("SBC") is currently consulting on their New Local Plan Issues and Options Document which sets out the range of issues facing the Borough and how, through a new strategic policy framework, they might be addressed. This includes the levels of housing required over the next 20 years (2020-2040) and how this provision might be distributed across the Borough.
- 1.5 This Promotional Document demonstrates that the site to the north of The Crescent will form a logical extension to the area of Doxey in Stafford.
- 1.6 This Promotional Document presents an analysis of the site and its surroundings. This includes a review of the current and emerging planning policy position. The Vision for the site, informed by a consideration of the constraints and opportunities is also set out, with an Indicative Masterplan demonstrating how the Vision can be achieved through a well designed scheme. The document concludes with a concise summary of the site, the proposed development and its key benefits.
- 1.7 Overall, this Promotional Document presents a sustainable site to support the site's future allocation through the New Local Plan.

Site Location • Not to scale



PLANNING POLICY CONTEXT

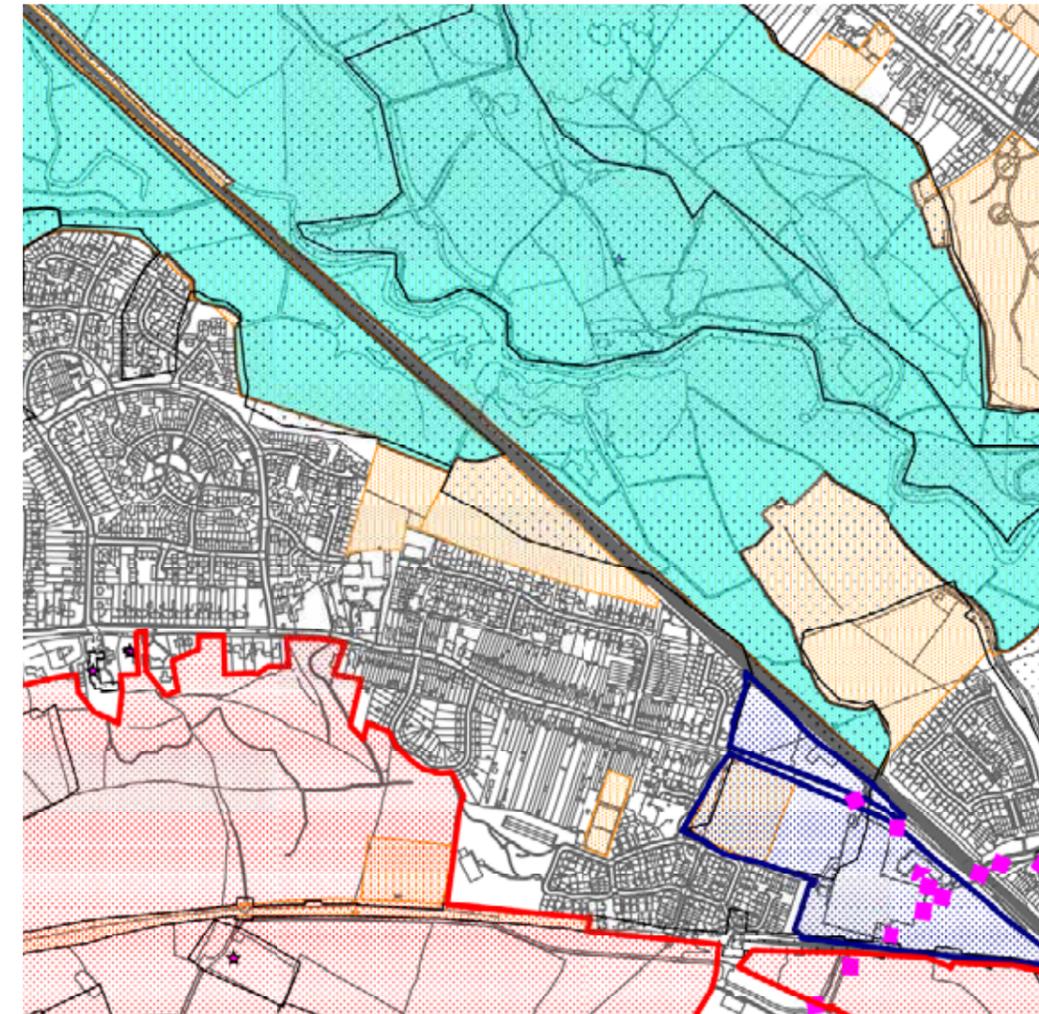
NATIONAL PLANNING POLICY FRAMEWORK

- 2.1 In July 2018, the Government published a revised National Planning Policy Framework ("NPPF") which replaces the previous guidance published in 2012. This was updated in February 2019 and provides the overarching planning framework for England. Central to the Framework is a presumption in favour of sustainable development which is the golden thread running through both plan-making and decision-taking (paragraph 11). The Framework also seeks to boost the supply of housing and requires local authorities to plan positively for objectively assessed needs and maintain a sufficient supply of housing land.
- 2.2 Paragraph 8 of the NPPF sets out that sustainable development has three overarching objectives: economic, social and environmental. The proposed development accords with each of these objectives, contributing to building a strong, responsive and competitive economy, supporting strong, vibrant and healthy communities and continuing to protect and enhance the natural, built and historic environment.
- 2.3 Chapter 5 of the NPPF sets out how local authorities should boost significantly the supply of housing in order to deliver sufficient supply of homes. The land north of The Crescent, Doxey, represents a deliverable site that is available, achievable and viable and would boost the supply of housing in the District.

DEVELOPMENT PLAN

- 2.4 The Development Plan for Stafford Borough currently comprises of The Plan for Stafford Borough (2011 to 2031) adopted June 2014 and the Plan for Stafford Borough – Part 2 adopted January 2017.
- 2.5 The Plan for Stafford Borough establishes the strategic policies for the Borough, notably the housing requirement, settlement hierarchy and the distribution of housing. The adopted Local Plan directed development of 7,000 homes at Stafford.
- 2.6 Spatial Principle 3 of the adopted Local Plan sets out the sustainable settlement hierarchy for the Borough. The County Town of Stafford is identified as being at the top of the hierarchy, given it is located on the national road and rail network and has the highest level of services and facilities, which means it has the greatest potential to provide for major new development.
- 2.7 The adopted Local Plan Policies Map identifies the following designations for the site:
 - Green Infrastructure
 - Staffordshire Historic Environment Record
- 2.8 The Plan for Stafford Borough identifies a Strategic Development Location (SDL) to the West of Stafford. This SDL will deliver approximately 2,200 new homes, local retail facilities, public open space and green infrastructure (including new children's play areas and multi-use games areas), social and physical infrastructure, primary school, community building and new areas of employment for new residents in the local area. The SDL will also support the delivery of the Western Access Improvements and associated transport improvements in the local area.
- 2.9 A Concept Plan for the West of Stafford SDL is contained within the Local Plan alongside the 'Burleyfields Masterplan' covering this SDL. The SDL adjoins the south of Doxey and therefore whilst not being within the SDL, the site at The Crescent is within close proximity and has good links to the SDL.

Policies Map · Not to scale



2.10 The new Local Plan is currently in an early stage of preparation. The Local Plan will include policies for the development and protection of land and site allocations for new development to meet future growth requirements. When adopted the new Local Plan will replace the current Local Plan in use.

2.11 There is no Neighbourhood Plan covering Stafford or Doxey.

NEW LOCAL PLAN

2.12 Stafford Borough Council has commenced work on a new Local Plan to replace the adopted Plan for Stafford Borough. The new Local Plan provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals. The review process will also ensure consistency with the new National Planning Policy Framework (NPPF), which seeks a requirement for local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years.

2.13 The Issues and Options Consultation Document defines the Spatial Principles and subsequent Development Strategy for the new Local Plan considering a new settlement hierarchy and a number of growth options for delivering new housing and employment across the Borough. The Proposed Settlement Hierarchy in the Issues and Options Consultation Document continues to identify Stafford at the top of the hierarchy. Regarding Stafford it states that it is the

“Largest urban area in the Borough with a regionally significant service centre role providing employment, retail and other facilities, and a key role in driving growth.”

2.14 It also sets out a number of potential Growth Options. These Options range from identifying growth at the most sustainable settlements of Stafford and Stone only, dispersing development across the new settlement hierarchy, focussing all new development at new Garden Communities only, or a combination of a number of these growth scenarios.

2.15 With regards to the majority of the potential growth options which seek to accommodate growth at Stafford, it is recognised that urban extensions and urban regeneration schemes would be required in Stafford as well as a range of medium and small sites to be allocated.

2.16 In the context of the potential growth options set out and the new settlement hierarchy that has been identified, it is clear that housing growth in Stafford will be required given it is identified as Tier 1 of the new settlement hierarchy and therefore the most sustainable settlement in the Borough, this includes the area of Doxey.

Strategic Housing and Employment Land Availability Assessment

2.17 The most recent Strategic Housing and Employment Land Availability Assessment (SHELAA) is the 2019 Update. The 2019 SHELAA Update considers land north of The Crescent, Doxey (site ID DOX01). The site is identified as having a capacity for 76 dwellings. The SHELAA considers the site to be available and achievable, however not suitable.

2.18 With regards to the suitability credentials of the site, it does lie outside of the settlement boundary but adjacent to the sustainable settlement of Stafford (Doxey) and in close proximity to public transport routes and many services and facilities.

2.19 With regard to technical and environmental considerations, the SHELAA identifies that the site is within the Flood Plain and is designated as Green Infrastructure. The suitability assessment goes on to identify the Historic Environment Record and presence of Landfill. It is important to highlight that the area of Flood Plain lies outside of the area of the site being promoted for development, with the area of Flood Plain restricted to a small sliver of land running along the north and north eastern boundaries.

2.20 The Stafford Green Infrastructure Strategy does not identify the site as being one of the Green Infrastructure Assets in Stafford Town. It identifies the site as being part of the wider green network for

Stafford, however there is no public access to the site and therefore provides no recreational benefit. Note that the West of Stafford Masterplan seeks to deliver a significant amount of new publically accessible Green Infrastructure in close proximity to the south of Doxey and the site.”

2.21 A number of Initial Technical Studies have been undertaken, the findings of which are summarised in this Promotional Document which address the points on suitability in the SHELAA.

HOUSING NEED

2.22 The NPPF requires local authorities to identify a sufficient amount and variety of land, that can come forward where it is needed, to support the Government’s aim of significantly boosting the supply of homes.

2.23 Paragraph 60 of the NPPF states:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”.

2.24 To determine the number of homes needed a local housing need assessment is required, conducted using the ‘standard method’. The standard method currently identifies a local housing need for Stafford Borough of 408 dwellings per annum, including an uplift to take account of market signals and affordability. This is identified as one of the six possible future housing need scenarios in the Issues and Options Consultation Document.



THE SITE

THE SITE

- 3.1 The site comprises Previously Developed Land (PDL) to the north of The Crescent in Doxey, Stafford, Staffordshire. It is a triangular shaped parcel of land and extends to approximately 3.1 hectares in size. The site is bounded by the West Coast Main Line railway along the north-east of the site. Residential development at The Crescent and Chetney Close is located directly to the south and south-west of the site. An area of open space, including a play area (The Crescent Play Area) is located directly to the south and west with Doxey Marshes, including the River Sow further to the north and west. Adjacent to the far eastern end of the site is a small extra care facility accessed via The Crescent.
- 3.2 The site is currently overgrown, comprised of mainly dense and continuous scrub. A number of hedges and immature trees are present with more established trees typically along the site's boundaries. The site also includes a large area of hardstanding situated in the west of the site, associated with its former use as a scrapyard. There is currently no public access to the site and it therefore serves no recreational value.
- 3.3 Given its former use and existing areas of hardstanding, the site is previously developed land (brownfield).



Historic aerial view of site (1971)



Views within the site





SURROUNDING AREA

- 3.4 The site is located directly adjacent to the north eastern edge of the residential suburb of Doxey, Stafford. Stafford town centre lies c.1.3km south east of the site, which includes an extensive range of higher order services, facilities and employment opportunities. Also, within the vicinity of the site is Doxey and Tillington Marshes (SSSI), the West Coast Main Line and the M6 Motorway.

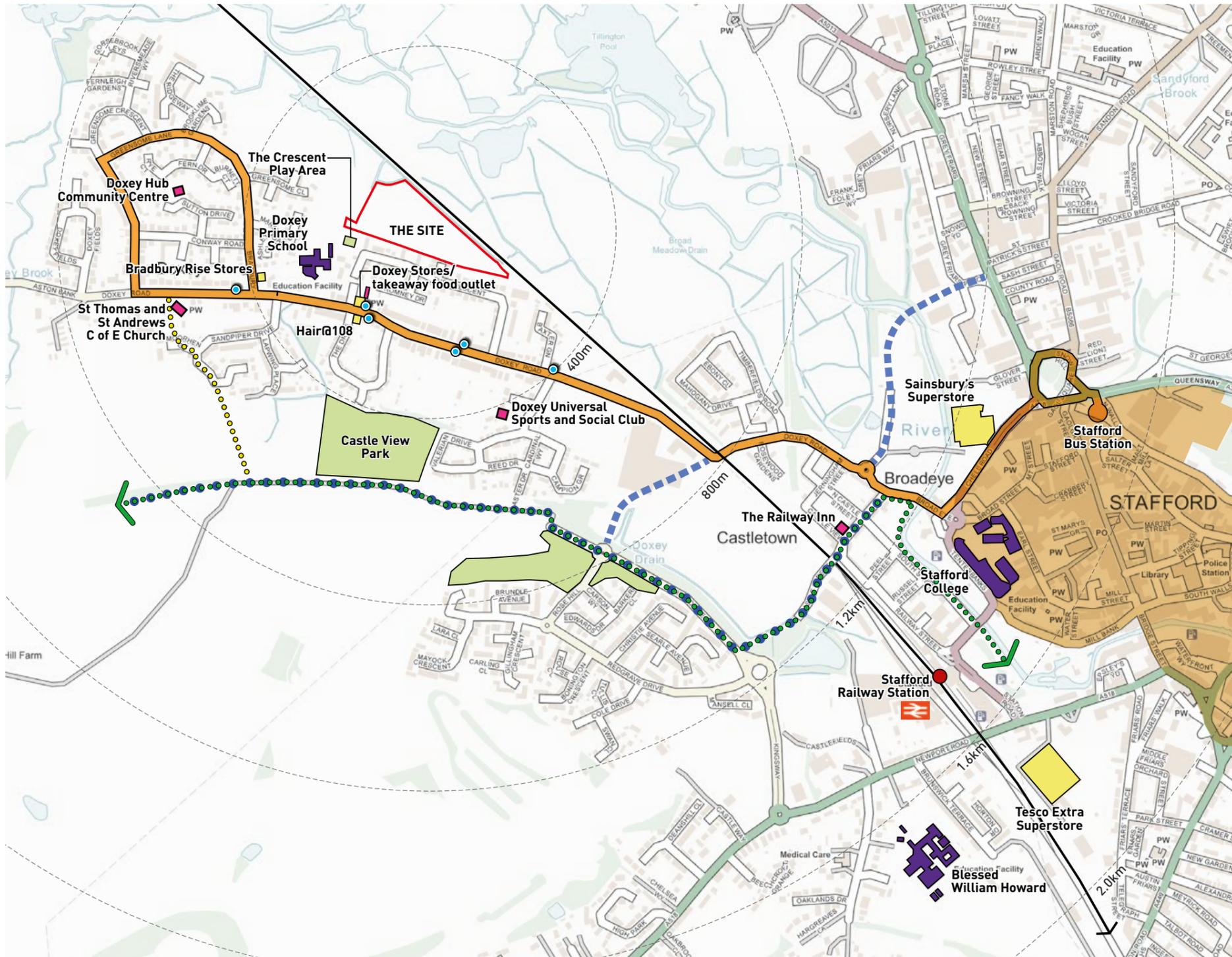
ACCESS

- 3.5 It is proposed that access to the site will be taken from The Crescent via an extension of Chetney Close, complemented by a separate pedestrian access at the western end of The Crescent. The new road would form a cul-de-sac, used to access the development.

SUSTAINABILITY

- 3.6 A local convenience store, takeaway restaurant and unisex hair salon are located within approximately a 335-metre walk to the south west on Doxey Road.
- 3.7 Doxey Primary School is located approximately c.65m south west from the site. The school is located on Doxey Road and can be easily accessed by walking along The Crescent and Walland Grove. The nearest secondary school is Blessed William Howard, located approximately 1.7m to the south east.
- 3.8 Other local facilities include The Crescent Play area (located adjacent to the south west corner of the site) Doxey Hub Community Centre (located c. 370m west) and Doxey Universal Sports and Social Club (located c. 300m south east). Castle View Park is located approximately 350m to the south, which contains a multi-use games area and play area.
- 3.9 Stafford town centre is located approximately 1.3km to the east. The town centre includes a number of large supermarkets, shops, Stafford College, parks and train station.
- 3.10 There is a bus route along Doxey Road, with the closest bus stops located within approximately a 360m walk via Chetney Close and 180m walk via Walland Grove. These stops are regularly served by buses to Stafford Town Centre.
- 3.11 The closest train station is Stafford Station which can be reached from the site in less than 30 minutes by foot or via bus with a short walk. The station is well connected on the West Coast Main Line, offering routes to London, Birmingham, Manchester and Liverpool.
- 3.12 The site is also within close proximity to the West of Stafford SDL located to the south adjoining Doxey. The SDL will deliver new employment development and improved connectivity in the local area which will benefit existing and new residents at Doxey.

Local facilities and connectivity · 1:10,000



LEGEND

- SITE BOUNDARY
 - CONNECTIVITY**
 - BUS ROUTE (Service number 12)
 - BUS STOP
 - PROPOSED STAFFORD WESTERN ACCESS ROUTE (Due to be completed Autumn 2021)
 - RECREATIONAL ROUTE (The Way for the Millennium)
 - PUBLIC RIGHT OF WAY (Footpath)
 - NATIONAL CYCLE ROUTE (Route 55)
 - RAILWAY LINE/STATION
 - FACILITIES AND LAND USE**
 - FOOD RETAIL
 - EDUCATION
 - COMMUNITY
 - RECREATION AND OPEN SPACE
 - STAFFORD TOWN CENTRE
- N 0 500m



THE PROPOSED DEVELOPMENT

CONSTRAINTS AND OPPORTUNITIES

4.1 Analysis of constraints and opportunities has informed the development proposals. The key constraints and opportunities are as follows:

- Existing vegetation within and along the site boundaries;
- Area of flood risk adjacent to the site;
- Railway line to the north of the site;
- SSSI located to the north and north west of the site;
- The ability to create safe, well considered, connection points into the local road network, including a pedestrian connection;
- Walkable route to Doxey Primary School;
- Provision of Sustainable Drainage; and
- Opportunities to enhance The Crescent Play Area via planning obligations.

Constraints and Opportunities · 1:2000



LEGEND

	SITE BOUNDARY (3.10ha)		EXISTING VEGETATION AND TREES
	SSSI		EXISTING HEDGEROW
	HIGH FLOOD RISK*		POTENTIAL PEDESTRIAN LINK TO DOXEY PRIMARY SCHOOL
	MEDIUM FLOOD RISK*		DOXEY PRIMARY SCHOOL
	EXISTING RAILWAY LINE		POTENTIAL VEHICLE AND PEDESTRIAN ACCESS
	GRASS/SCRUB/ROUGH GRASS		POTENTIAL SUDS
	EXISTING PUBLIC OPEN SPACE		

* Referenced from RACE Flood Risk Assessment and Drainage Strategy



Feasibility Layout • 1:1000

Prepared by BM3



ACCOMMODATION SCHEDULE

AFFORDABLE			
DWELLING TYPE		GI FLOOR AREA	AMOUNT
B	2B4P HOUSE	680 sqft	15
C	3B5P HOUSE	912 sqft	02
D	3B5P HOUSE	914 sqft	27
L	4B6P HOUSE	1065 sqft	12
TOTAL			55

PRS			
DWELLING TYPE		GI FLOOR AREA	AMOUNT
● SUTTON	2 BED HOUSE	651 sqft	14
● ABBERLEY	3 BED HOUSE	745 sqft	16
● ROTHLEY	3 BED HOUSE	819 sqft	06
● RINGWOOD	3 BED HOUSE	832 sqft	10
● FRESWATER	4 BED HOUSE	993 sqft	03
● FRAMPTON	4 BED HOUSE	1053 sqft	04
TOTAL			55

GRAND TOTAL 109

--- Site boundary

--- Extent of flood risk

THE PROPOSALS

- 4.2 The proposals include the development of 109 new homes, including the provision of 55 affordable homes and 54 build-to-rent units. A mix of dwelling types are proposed including the provision of 2, 3 and 4 beds.
- 4.3 The proposals also include a new area of open space in the northern corner of the site. New footpath connections are proposed to The Crescent and The Crescent Play Area. There will be areas of new soft landscaping and planting across the site. There will be hard-surfaced areas for parking and access.

- 4.4 Boundary vegetation will be retained where practical, in particular along the northern boundary to provide a level of screening between the development and the railway line.
- 4.5 The development is proposed to be served from a single point of access achieved from Chetney Close.

- 4.6 Chetney Close presently comprises a 5m-wide shared surface road with 1.8m-wide service strips to each side. It is proposed that the service strips along Chetney Close could be converted to paved footways, to tie into similar provision within the development site. The proposed 109 dwellings plus the existing 8 dwellings along Chetney Close would be expected to generate significantly less than 100 vehicles movements in any single hour needed for cul-de-sacs to work well.



TECHNICAL CONSIDERATIONS

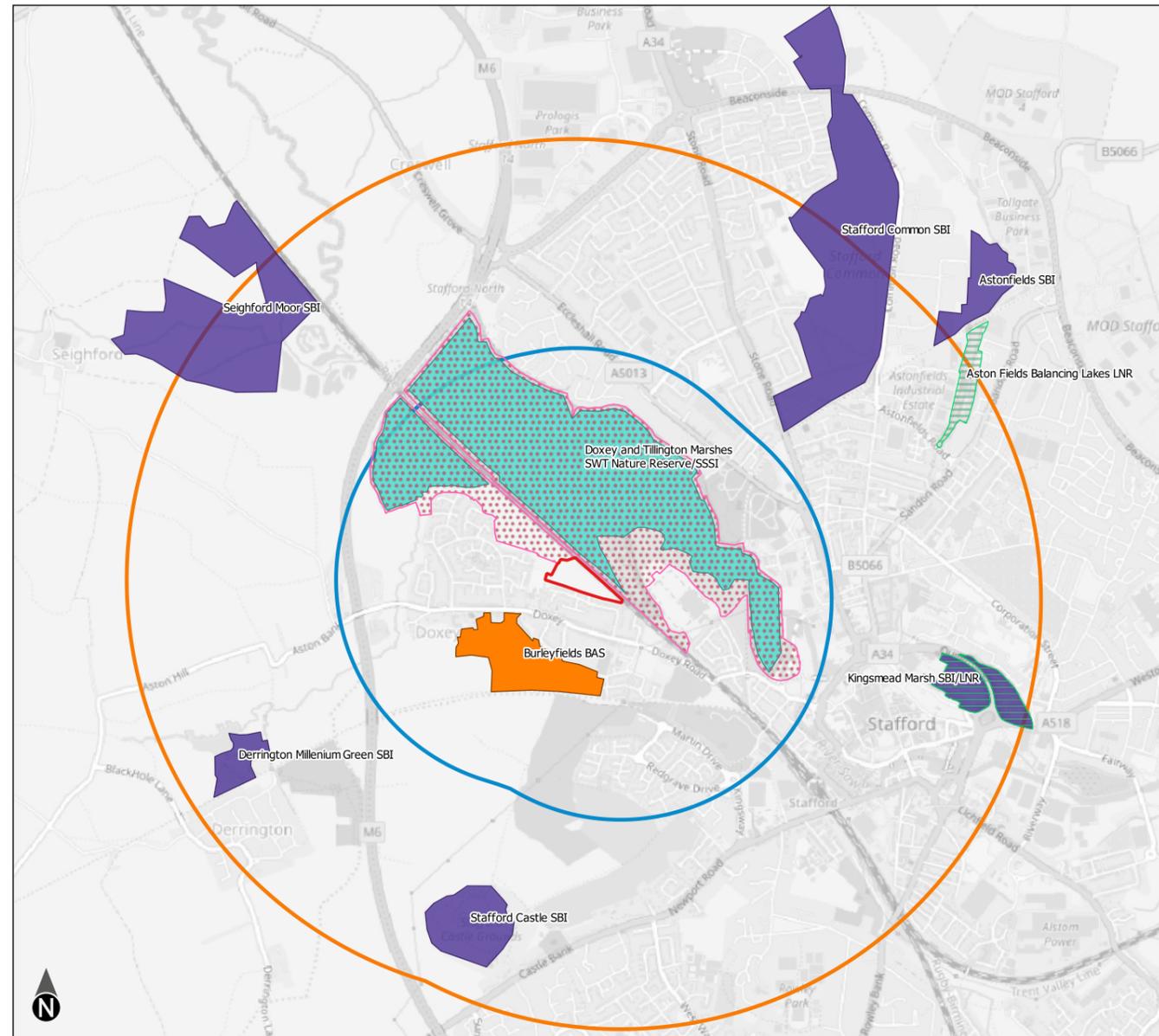
ECOLOGY

- 5.1 A Preliminary Ecological Appraisal (PEA) has been prepared by FPCR Environment and Design, to identify the presence/potential presence of habitats and species within the site to allow an initial assessment of their ecological value, whilst also highlighting any potential ecological constraints to development. The PEA also sets out recommendations for additional surveys and potential opportunities for mitigation and enhancements as part of any future development.
- 5.2 Under the NPPF, the development will contribute to a net gain in biodiversity with an emphasis on improving ecological networks and linkages where possible.

Designated Sites

- 5.3 No statutory or non-statutory designated sites for nature conservation are located within the site.
- 5.4 There are six sites of International importance within a 15km radius of the site, including the Cannock Chase SSSI/SAC/AONB. However, all of these sites are over a 7km distance from the site. Due to the scale of the proposed development and the large distances between the site and the designated sites (within a 7-15km radius), no significant impacts upon the nature conservation value of these sites from the proposed development are expected.
- 5.5 A site of National Importance for nature conservation, Doxey and Tillington Marshes SSSI is located to the north and north-west of the site, predominantly separated from the site by the West Coast Main Line. A small area of the SSSI lies adjacent to the north western corner of the site. The site falls within the first SSSI Impact Risk Zone for Doxey and Tillington Marshes SSSI. As a result, a detailed assessment of the proposals would be undertaken to ensure negligible impacts upon the SSSI.
- 5.6 There are 6 non-statutory sites located within a 2km radius of the site, including Burley Fields BAS (c. 200m to the south-west). As with the statutory sites, a detailed assessment of potential impacts upon these sites would have to be undertaken as part of the proposals.

Designated sites - Not to scale (Prepared by FPCR)



Key

- Site Boundary
- Doxey Designated Sites**
- LNR
- SSSI
- SWT Nature Reserve
- Site of Biological Importance
- Biodiversity Alert Site
- Buffers**
- 1km buffer
- 2km buffer

Habitats

- 5.7 The majority of the site consists of dense, continuous scrub which will be lost as a result of the proposed development. This habitat has very limited diversity and is dominated by common and widespread species and is therefore assessed as being of low ecological value. Due to the lack of species richness and limited extent of pockets of scattered scrub, this habitat is considered to be of low intrinsic ecological value. It is considered that the loss of this habitat is not a statutory ecological constraint to the development.
- 5.8 The PEA recommends that species-rich grassland with native species scattered scrub habitat be created where possible within the proposed development to mitigate for the loss of the current scattered scrub habitat which may hold value to the local faunal species.

Bats

- 5.9 Records for bats were returned within a 1km radius of the site, with the majority of these associated with Doxey and Tillington Marshes north of the site, with others taken from residential areas to the south and west.
- 5.10 In general, the habitats at the site were in close proximity to good bat foraging habitat within the SSSI to the north of the site. Although direct connectivity between the on-site habitats and the wider landscape via woodland or linear landscape features such as hedgerows is lacking, within the majority of connectivity with the site being along the western boundary, and a train line separating the site from the SSSI on a terrestrial level, disturbance levels between the site and directly adjacent habitats were low due to lack of development and heavy human traffic. It is likely that bats make use of the habitats within the survey area as part of their foraging and commuting range.
- 5.11 The PEA recommends that seasonal bat activity transect surveys should be completed within 12 months prior to the site being developed, this is to identify foraging areas, commuting routes and species utilisation of the development and adjacent area.

Badgers

- 5.12 No certain evidence of badger activity, or any badger setts were identified within the areas of the site accessible at the time of survey, or the accessible land within 30m of the site. However, within the areas of the site that could be surveyed in detail, a number of mammal runs were noted within scrub habitat. As suitable habitat to support badgers was observed within the site and a number of mammal runs noted. The PEA recommends that a full badger survey be carried out across the site.

Birds

- 5.13 Suitable nesting and foraging habitat for a wide variety of common bird species was present across the site. Within the accessible areas of the site, open habitat was rare and therefore the site has been assessed as being of sub-optimal suitability for ground nesting birds.
- 5.14 The PEA undertaken recommended that the loss of such habitat be mitigated for by additional planting of native woody species and/or hedgerows within the proposed development scheme, as well as appropriate management of retained habitats, particularly around the site peripheries. This will help to maintain ecological connectivity around the site and local area.
- 5.15 It is also recommended that additional enhancements be considered for inclusion within the development such as the provision of nest boxes.

Amphibians

- 5.16 Great Crested Newts records were found 1km south of the site within a residential area and adjacent agricultural land. There are no waterbodies in the site itself at the time of survey. There are 15 waterbodies present within a 500m radius of the site, which have the potential to provide amphibians, including Great Crested Newts.

Water Vole

5.17 Water vole records were returned for within a 1km radius of the site. However, within the accessible areas of the site, no wetland habitat was found to be present and the grassland habitat which is favoured by water vole for foraging is very limited. As such, the site has been deemed sub-optimal for use by water vole.

Reptiles

5.18 Common lizard records were taken from within the Doxey and Tillington Marshes SSSI and from the edge of a development area south of the survey site. The slow-worm records were scattered within the residential area of Doxey village to the west and south. No evidence of reptiles was noted during the survey, however suitable habitats were present for common reptile species within the site. The PEA therefore recommends that reptile surveys be carried out across the entire site with further recommendations based on the findings.

Invertebrates

5.19 The majority of invertebrate records were mainly concentrated within Doxey and Tillington Marshes SSSI. The site is considered to provide a variety of suitable foraging, resting and reproductive habitats for a range of common terrestrial invertebrate species.

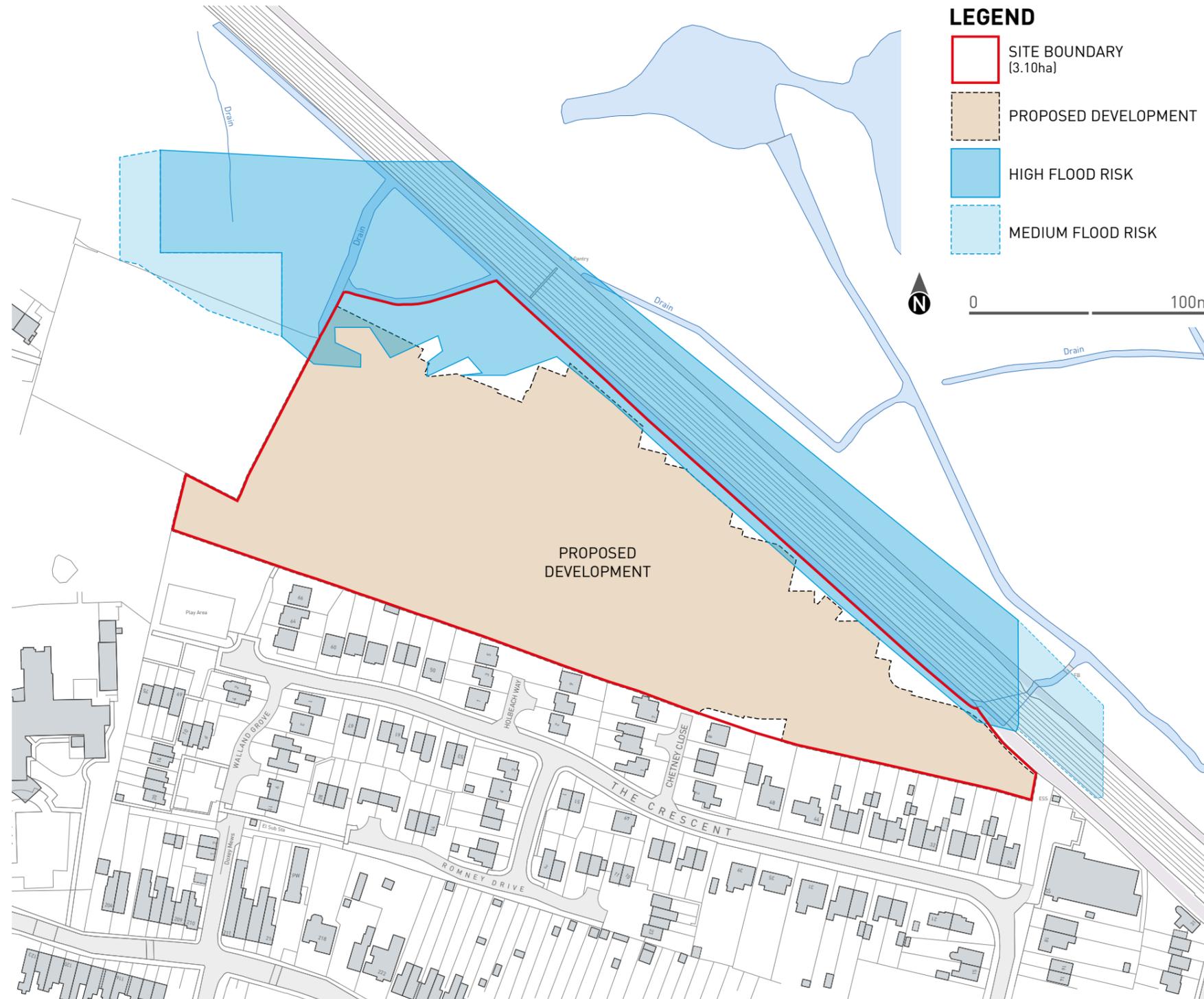
5.20 The PEA recommends the retention of some of the habitat along the site peripheries, along with mitigation for the loss of habitats via habitat creation, such as new native species rich hedgerows alongside species rich grassland and/or native species scrub. These measures would provide foraging habitat and shelter, as well as connectivity with the wider local landscape. Within the landscaping scheme, planting of new native trees, shrubs and flowering lawn mixes would also provide further mitigatory and enhancing effects to the loss of invertebrate habitat.

Phase 1 Habitat Survey (Prepared by FPCR) • Not to scale





Proposed Development and Flood Risk · 1:2000



FLOOD RISK AND DRAINAGE

- 5.21 A Flood Risk Assessment (FRA) and Drainage Strategy has been prepared by RACE (Residential and Commercial Engineering). This considers the risk of flooding to the site and impact of any potential flooding from the development proposals.
- 5.22 The Environment Agency (EA) Flood Risk map shows that the vast majority of the site is situated within Flood Zone 1. The lowest parts of the site are within Flood Zones 2 and 3, however this is only confined to a sliver of land running along the north-western boundary with the railway line and a small area of land in the northern corner.
- 5.23 However, all built development will be kept well outside of these areas and within the areas of the site situated within Flood Zone 1, which is land considered to have a low probability of fluvial/tidal flooding.
- 5.24 The building area will be outside of the 1 in 1,000 year flood envelope of the River Sow and therefore should not be constrained for any attached issues. Flows from the proposed site will be controlled to equivalent greenfield runoff rate for the mean annual event, providing significant downstream betterment.
- 5.25 Furthermore, houses will be raised so that their floor levels are 600mm above the predicted 1,000yr event in the River Sow adjacent to the development which would make minimum floor level 76.46m AOD.
- 5.26 As the access is situated within EA Flood Zone 1 and there is no history of flooding at the site, it is considered all access and egress routes to the site are safe.

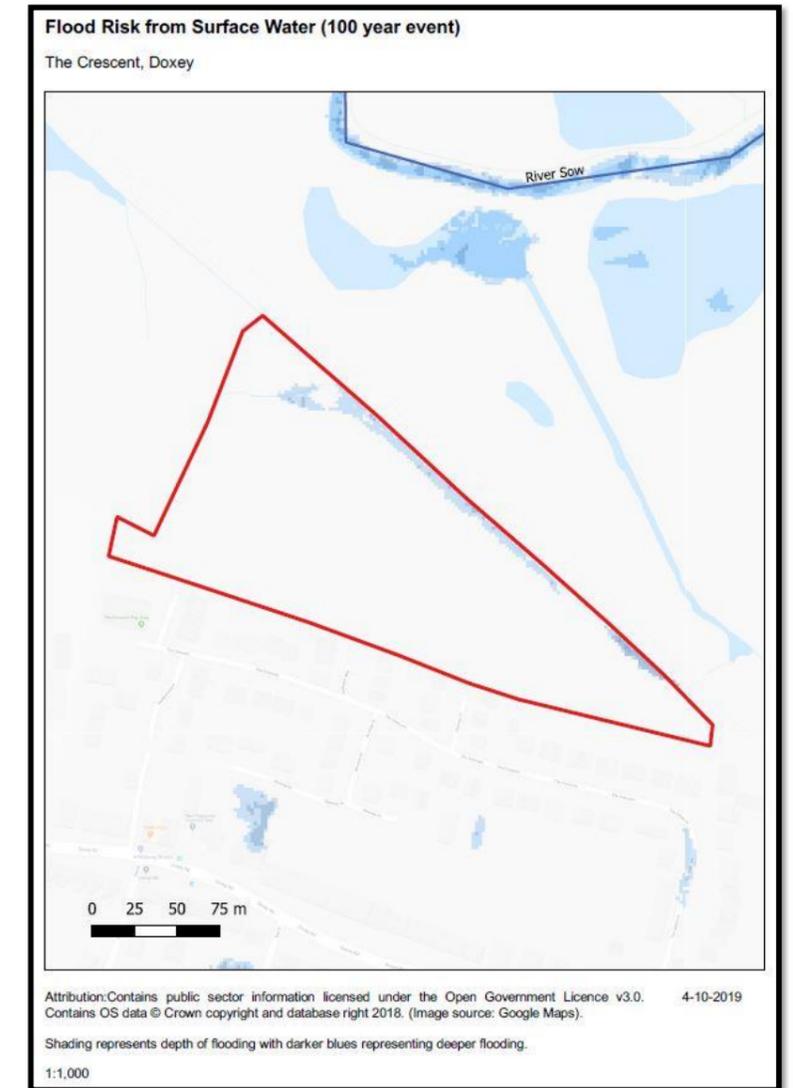
- 5.27 There are currently no historic records indicating that the site is susceptible to groundwater flooding, pluvial flooding (surface water) and sewer flooding and it is not considered there is notable risk from these sources of flooding in the future.
- 5.28 It is proposed to include a number of Sustainable Drainage methods within the scheme. The proposed methods will likely consist of trapped gullies on highways, leading to a potential attenuation pond (incorporating a low flow grassed channel) or a final treatment channel/swale, trapped gullies and underground storage.
- 5.29 A minimum of two SUDS treatment trains will be introduced into the scheme, which will treat discharged storm water. Maintenance will be undertaken by management companies by agreement, or adopting authority.
- 5.30 The FRA shows that the proposed development can be accommodated in its proposed location with low risk of flooding to the development site and no increase in risk of flooding to adjacent properties, whilst maintaining the existing Q bar Greenfield flow rates from the proposed site to the downstream network. This will result in significant reductions in flow for all events above the mean annual flood event, which will reduce flood pressures on the River Sow system downstream. There will therefore be no increase in flood risk due to the construction of the proposed development.
- 5.31 In terms of foul sewage, this will be discharged via a pumping station sited in the south western corner of the site. This will pump to the foul manhole in Chetney Close. The calculated proposed peak flow from the 109 houses will not have an adverse effect on the system.

EA Flood Zone 2 and 3 · Not to scale



From RACE Flood Risk Assessment
Darker blue = 100 year event

EA 100 year surface water floodplain · Not to scale



From RACE Flood Risk Assessment



HIGHWAYS AND ACCESS

- 5.32 An Access Appraisal has been prepared by Beacon Transport Planning. This considers both highway access and the ability to access the site via sustainable travel modes and to access opportunities, services and amenities.
- 5.33 It is proposed that access will be taken from The Crescent via an extension of Chetney Close, complemented by a separate pedestrian access at the western end of the Crescent; there may be potential to provide emergency vehicle access over this pedestrian access or at the eastern end of the site.
- 5.34 A 5m carriageway width is sufficient for two vehicles (including a large vehicle) to easily pass.
- 5.35 Chetney Close presently adjoins The Crescent via a splayed dropped-kerb footway crossing. The service strips, which extend alongside the crossing splays to the 3-m wide footway along The Crescent, allow for the junction to be modified within highway extents to provide for a kerbed bell-mouth junction. These proposed highway alterations would provide for an access geometry suitable to serve the scale of development proposed, adequately accommodating the swept paths of refuse collection and any other service vehicles.
- 5.36 The proposed alterations to the junction of Chetney Close with The Crescent would provide an arrangement that should very easily accommodate the capacity requirement of vehicle movements.
- 5.37 The Crescent adjoins Doxey Road via a three-arm junction that is signal-controlled, seemingly in response to visibility constraints and to suitably accommodate the swept paths of turning vehicles. The signals have an efficient two-stage, vehicle-actuated operation, providing a relatively high operational capacity able to accommodate frequent turning movements in and out of The Crescent. Such capacity should easily accommodate vehicle movements associated with the proposed development in addition to those associated with existing dwellings.
- 5.38 The existing signal control of the junction of The Crescent with Doxey Road also provides for safe vehicular operation, as well as gaps in traffic flow to enable pedestrians to cross. Accident data shows that there has been no road traffic collisions resulting in personal injury recorded as having occurred at the junction within the last 10-years. No accidents are recorded anywhere along The Crescent.

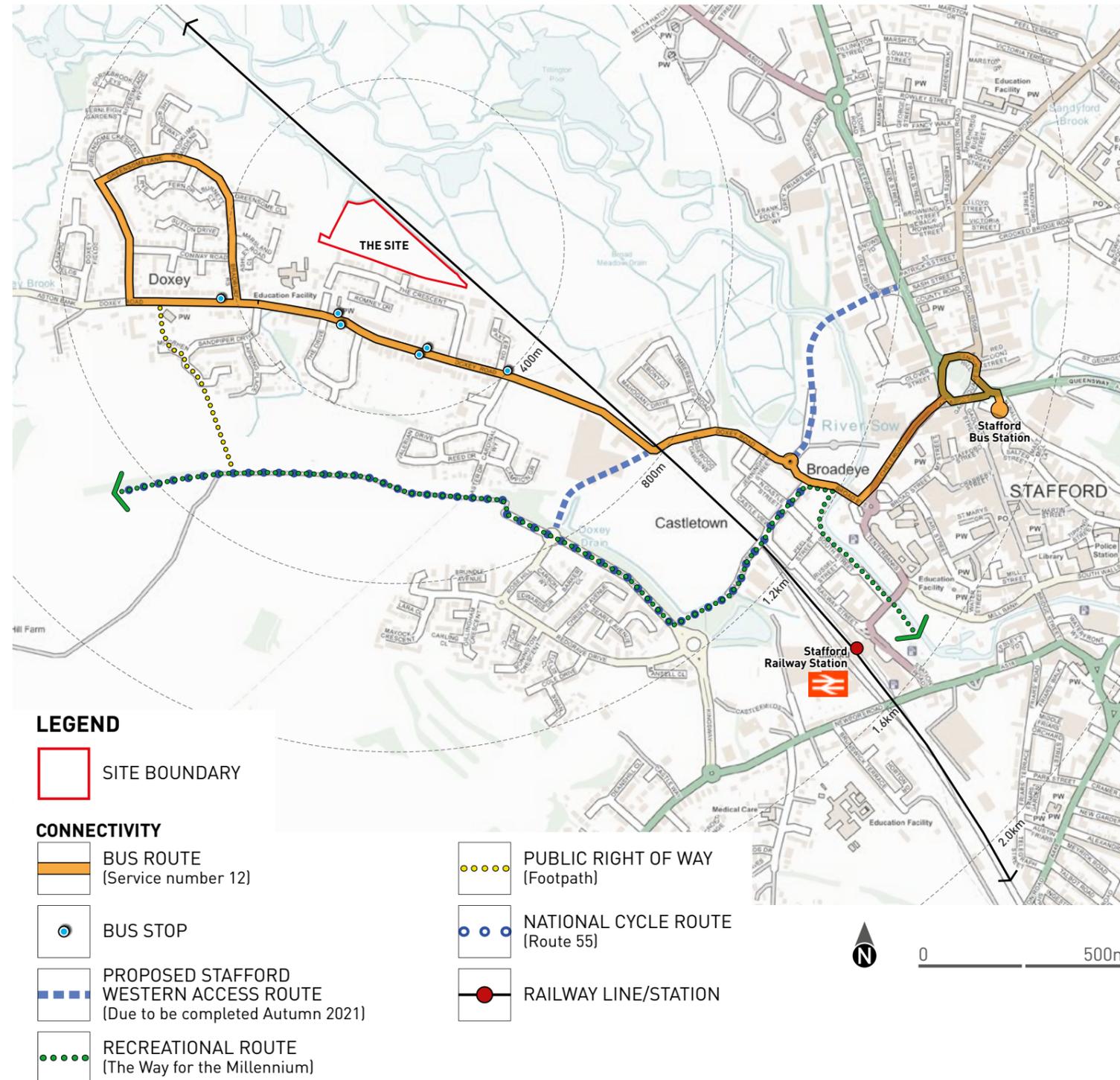
Walking and Cycling

- 5.39 The provision of footways along Chetney Close to extend into the site, along with a separate pedestrian access to the west, would provide safe and convenient walking routes between the site and local facilities in Doxey (including Doxey Primary School, convenience stores, hot-food takeaway, The Crescent Play Area and Castle View Play Area & Open Space). Stafford town centre, including Stafford College and Rail Station are also within walking distance of the site, where there are employment and educational opportunities, retail and leisure offerings and healthcare services.
- 5.40 All local roads are lit and Doxey Road is subject to traffic calming, providing for a low-speed cycling environment. The Stafford to Newport Greenway (part of National Route 55) is located approximately 500m to the south and the Isabel Trail (part of National Route 5) is located along Doxey Road approximately 750m to the east. The site is within a reasonable cycling distance of the whole of Stafford, including Tollgate Industrial Estate, Staffordshire Technology Park, Beacon Business Park and County Hospital.

Public Transport

- 5.41 Bus stops are located along Doxey Road to the west of The Crescent and to the east of The Drive, both within 400m walking distance of the site. These accommodate the No.12 Stafford-Doxey services, which operates on an hourly basis from Monday to Saturday and provides direct access to Stafford town centre.
- 5.42 Stafford rail station is accessible by foot or cycle. It accommodates West Midlands Trains services between London, Birmingham, Stoke-on-Trent, Crewe and Liverpool; Avanti Train Services between London, Birmingham, the North-West and Scotland; and Cross-Country services between Manchester, the South and South West.
- 5.43 The site is readily accessible by sustainable travel modes, with a range of opportunities, facilities and services within walking and cycling distance of the site or accessible by bus and rail services providing access to major centres.

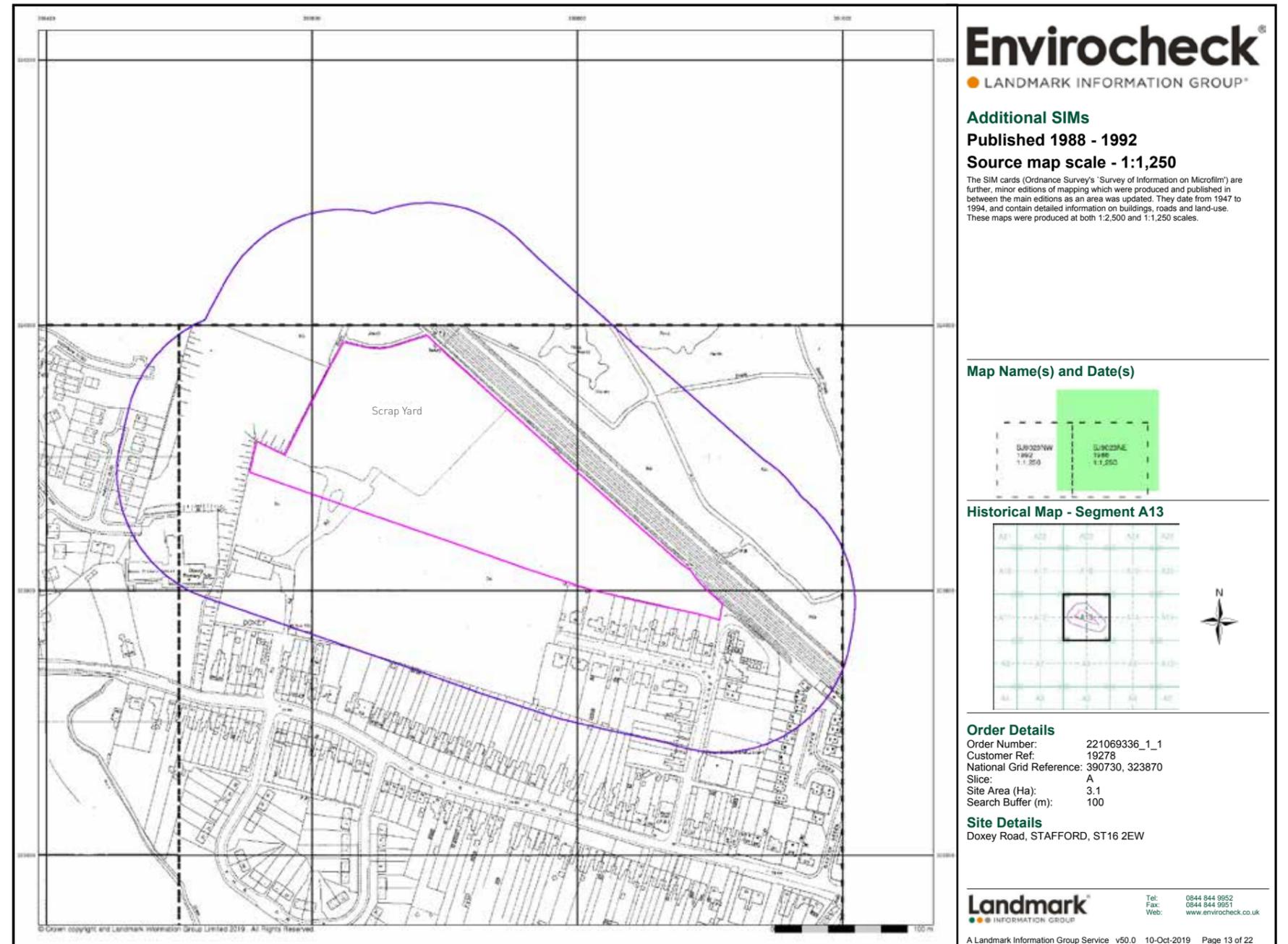
Connectivity · 1:12,500



GROUND CONDITION AND POLLUTION

- 5.44 A Phase 1 Ground Investigation Desk Study has been prepared by Georisk Management Limited.
- 5.45 Historical maps indicate the site was undeveloped open land with drainage ditches until maps dated 1923 show a small Sand Pit and unnamed building in the central southern area. The pit was expanded and modified until maps dated 1988 – 1992 show the site to have been infilled in entirety. A Scrap Yard is recorded in the northern central area from 1988 - 1994. No further significant developed has occurred to date. The surrounding area has been subject to the same mineral extraction and infilling over the same timeframe as onsite.
- 5.46 Potential ground contamination risks have been identified at the site, particularly in the areas of landfill. To determine appropriate remedial measures to allow these areas to be developed, robust investigation and risk assessment inline with best practice would accompany any future planning application.

From Phase 1 Desk Study Report · Not to scale (prepared by Georisk Management)



LANDSCAPE AND VISUAL

- 5.47 At a site-specific level, the site comprises previously developed land which is densely vegetated and extends to approximately 3.1 hectares. The vegetation extends to the majority of the site boundaries which softens the site within the surrounding urban context.
- 5.48 The site is influenced by existing residential properties off The Crescent to the south and the Railway Line running adjacent to the northern boundary.



View along the boundary adjacent to the West Coast Main Line railway line

- 5.49 There are no Public Rights of Way located within or adjacent to the site and the site is not located in or near to a sensitive landscape area such as an AONB.
- 5.50 A Landscape and Visual Impact Assessment will be prepared to accompany any future planning application.

CULTURAL HERITAGE

- 5.51 There are no statutory or non-statutory designations within, or adjacent to the site. Similarly, there are no Scheduled Ancient Monuments (SAM), Historic Parks and Gardens, Registered Battlefields, World Heritage Sites, Conservations Areas or Listed Buildings within, or adjacent to the site.
- 5.52 The closest statutory designation is two Grade II Listed building in Doxey, located c.450m south west of the site and well separated by the existing residential area.
- 5.53 The Plan for Stafford Proposals Map identifies the site as being within a wider area identified as Historic Environment Record. In terms of historic landscape sensitivities and historic environment character value, the Stafford Green Infrastructure Strategy identifies the site as having a medium sensitivity/value. However due to the sites historic use and separation from nearby Listed Buildings and Conservation Areas it is considered that this does not present a constraint to development of this site.

NOISE

- 5.54 A noise survey will accompany any future planning application on the site. Noise from trains passing along the Railway Line north of the site will likely be the main noise source affecting the site. Any future planning application will ensue that the relevant acoustic mitigation measures can be implemented and delivered on site to ensure that an appropriate level of amenity can be provided for the proposed residential amenity.

UTILITIES

- 5.55 Electricity, gas and water supplies can be provided for the proposed development subject to extensions to the local network.



06

CONCLUSIONS

SUMMARY

- 6.1 The information contained within this Promotional Document demonstrates that there are no overriding environmental or physical constraints which would preclude the development of the site. Residential development in this location would provide a sustainable addition to Doxey and would contribute towards the creation of an inclusive sustainable community. It has been demonstrated that the application site is physically and technically suitable for development. The development proposals will evolve further as the development of the site is progressed through a detailed planning application submission.



DESIGN



ENVIRONMENT



PLANNING

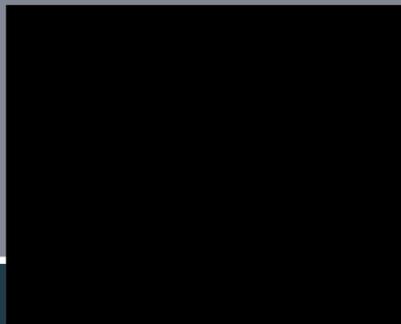


ECONOMICS



HERITAGE

pegasusgroup.co.uk



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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		Mr
First Name		Neil
Surname		Cox
E-mail address		
Job title (if applicable)		Director
Organisation (if applicable)	Richborough Estates	Pegasus Group
Address		
Postcode		
Telephone Number		

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

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

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

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

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

Please note:

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

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

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name: Neil Cox		Organisation: Pegasus Group on behalf of Richborough Estates			
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	See attached	Other	
2. Please set out your comments below					
<p>Please see attached representation structured in order of questions raised within Issues & Options consultation document.</p>					

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

Please use a continuation sheet if necessary

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

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

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

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

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

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

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

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

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

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

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

STAFFORD BOROUGH LOCAL PLAN 2020-2040

ISSUES & OPTIONS (JANUARY 2020)

LAND SOUTH OF WESTON

ON BEHALF OF RICHBOROUGH ESTATES

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN **ENVIRONMENT** **PLANNING** **ECONOMICS** **HERITAGE**

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CONTENTS:

Page No:

1.	INTRODUCTION	2
2.	CONTEXT	4
3.	EVIDENCE	5
4.	VISION & STRATEGIC OBJECTIVES	6
5.	SUSTAINABILITY & CLIMATE CHANGE	8
6.	THE DEVELOPMENT STRATEGY	10
7.	DELIVERING HOUSING	20
8.	DELIVERING QUALITY DEVELOPMENT	28
9.	ENVIRONMENTAL QUALITY	34
10.	LAND SOUTH OF WESTON	36
11.	CONCLUSION	44

APPENDICES:

- APPENDIX 1: SITE LOCATION PLAN OPTION A
- APPENDIX 2: SITE LOCATION PLAN OPTION B
- APPENDIX 3: INDICATIVE MASTERPLAN

EXECUTIVE SUMMARY

This submission, on behalf of Richborough Estates, responds to the Council's Issues & Options consultation document. Richborough Estates supports Stafford Borough Council's Local Plan Review process to ensure development is genuinely plan-led to 2040.

Richborough Estates has an interest in approximately 15.45 hectares of land to the south of Weston.

These representations promote two options for land adjoining the southern edge of Weston.

The first, Option A, is a 1.55 hectare site which lies to the south of Green Road at its eastern end close to the junction with the A51. This is shown at **Appendix 1**. The second, Option B, is a larger site of 15.45 hectares which incorporates Option A but extends southwards along the settlement edge to the west and along the A51 to the east. This can be seen at **Appendix 2**.

Option A has a SHLAA reference WES03. Option B comprises two SHLAA sites, references WES02 and WES03 which combine to form the larger site proposal.

1. INTRODUCTION

- 1.1 These representations are made by Pegasus Group, on behalf of Richborough Estates in response to the Stafford Borough Local Plan Review (2020 – 2040) 'Issues and Options Consultation Document February 2020.' These representations relate to land south of Weston, and this is being promoted in two ways.
- 1.2 The first, Option A, is a 1.55 hectare site which lies to the south of Green Road at its eastern end close to the junction with the A51. This is shown at **Appendix 1**. The second (Option B) is a larger site of 15.45 hectares which incorporates Option A but extends southwards along the settlement edge to the west and along the A51 to the east. This can be seen at **Appendix 2**.
- 1.3 Option A has a SHLAA reference WES03. Option B comprises two SHLAA sites, references WES02 and WES03 which combine to form the larger site proposal.
- 1.4 These representations respond to the 'Issues and Options' consultation document and accompanying published evidence, having regard to the national and local policy context. Where appropriate, Richborough Estates provide a response to the specific questions set out within this document.
- 1.5 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:
- a) **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;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

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

1.6 The representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2. CONTEXT

- 2.1 Richborough Estates supports Stafford Borough Council's decision to commit to a review of the adopted Stafford Borough Local Plan. This provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 2.2 The most recent National Planning Policy Framework (NPPF) (February 2019) requires local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years. The proposed timescales, as set out within the Local Development Scheme, will ensure that an up to date Local Plan for the Borough will be in place to support growth and meet future development needs.
- 2.3 The Local Plan Review is necessary in order to respond to the need for continued growth within the Borough to 2040 and to ensure consistency with national policy and guidance.
- 2.4 The Issues and Options consultation follows previous Issues consultation, which scoped issues that affect the Borough, and looked at options for addressing them. The Issues document also set out a proposed new settlement hierarchy that had regard to the Settlement Assessment. The current consultation document utilises the response to the previous consultation to further explore the vision and strategic objectives to 2040 and highlights a range of growth and spatial strategy options for delivering growth within the Borough.
- 2.5 Richborough Estates supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up to date policy framework exists within the Borough to guide growth to 2040 and to ensure that development is genuinely plan led.

3. EVIDENCE

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

- 3.1 The list of assessments and studies identified within the consultation document represents a suitable list, however it should be recognised that this evidence should be refreshed throughout the review process where necessary to reflect changing circumstances or guidance. In addition, Richborough Estates recognises that elements of the evidence base will need to be iterative with the emerging growth requirements and spatial distribution of growth.
- 3.2 The vision is supported by Richborough Estates and reflects the existing Vision contained within the adopted Local Plan Strategy which remains appropriate for an extended plan period to 2040.

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

- 3.3 Paragraph 1.10 makes reference to an 'Infrastructure Delivery Programme' which is assumed to represent an Infrastructure Delivery Plan identifying the necessary infrastructure to support new development. Again, it is recognised that this will be refined at each stage of the plan making process being intrinsically linked to any preferred spatial strategy and the outcome of discussions through the Duty to Cooperate.

4. VISION & STRATEGIC OBJECTIVES

- 4.1 It is noted that the adopted Local Plan contains a detailed Vision and a significant number of Key Objectives. Both the Vision and Key Objectives contain a number of spatially specific elements i.e. Stafford, Stone or lower tier settlement specific elements. Richborough Estates considers it is necessary to review this approach.

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

- 4.2 Richborough Estates considers that the Vision contained within the adopted Local Plan is overly protracted and fails to clearly and succinctly set out a comprehensive Vision for the Borough.
- 4.3 The Local Plan Review process provides a perfect opportunity to distil the current Vision into a locally relevant, yet Borough-wide Vision that clearly aligns to the spatial change sought in Stafford Borough to 2040.

Question 3.B: Do you agree that the Vision should be shorter?

- 4.4 Richborough Estates agrees the Vision should be shorter as set out above. This could be achieved through the removal of the sub-sections for both Stafford and Stone which would sit more usefully within a Neighbourhood Plan to be defined and refined by local communities.

Question 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?

- 4.5 The 'Scoping the Issues' consultation summary contained within the current consultation document identified the support for renewable energy sources and the future proofing of new development via the use of technology as reoccurring or key responses.
- 4.6 It is recognised that Stafford Borough Council has declared a 'climate emergency' and has committed to preparing a report to set out how the Council proposes to respond. The implications of climate change for emerging policy to be contained within a new Local Plan should be informed by the Council's Climate Change Strategy/Report currently in preparation. Richborough Estates considers that any recognition of Climate Change to be incorporated within the Vision should await the outcome of the Council's corporate stance on climate change.

Question 3.D: Should the spatially-based approach to the objectives be retained? Does this spatially-based approach lead to duplication?

4.7 Richborough Estates considers the 28 key objectives contained within the adopted Local Plan to be protracted and repetitive. This is, in part, due to the spatially-based approach taken by the Borough Council previously.

4.8 In line with comments in respect of the Vision, Richborough Estates consider that the review provides an opportunity to distil elements of the current objectives that remain relevant to the Borough, into a concise set of Borough-wide objectives.

Question 3.E: Is the overall number of objectives about right?

4.9 Richborough Estates considers the list of current objectives is far too long. A shorter list of succinct, locally relevant Borough-wide objectives would provide greater clarity and understanding of the most important areas of change or protection within the Borough.

Question 3.F: Should there be additional objectives to cover thematic issues? If so what should these themes be?

4.10 Richborough Estates does not support the preparation of additional objectives, but reconsideration of the existing objectives. Updated objectives should include:

- Approach to spatial distribution of growth to support sustainable communities
- Meeting housing needs
- Economic growth requirements
- Infrastructure delivery
- Range of locally relevant thematic topics that would include climate change, centres, leisure, heritage, ecology, landscape and the creation of high-quality new development.

5. SUSTAINABILITY & CLIMATE CHANGE

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. 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? What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the Borough?

- 5.1 Whilst it is commendable to deliver enhanced energy efficiency as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.

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?

- 5.2 Whilst it is commendable to deliver renewable and low carbon energy as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.

- 5.3 The ability for large developments to source a certain percentage of their energy supply from on-site renewables will need to be balanced with the burden of delivering other infrastructure requirements that will be required to support the chosen spatial strategy to ensure the delivery of sustainable communities.

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

- 5.4 Whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such

requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. 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 PPG. This evidence does not appear to be present.

- 5.5 The policy approach should be informed by a Water Cycle Study to determine whether the scale, location and timing of planned development within the Borough would give rise to issues from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.

6. The Development Strategy

- 6.1 Richborough Estates supports the review of the spatial development strategy to establish the scale and distribution of new housing and employment development to 2040.

Question 5.A: Do you consider that the existing Policy SP1 addresses the requirements of the NPPF? Do you consider that it is necessary to retain this policy in light of the recent changes in Planning Inspectorate's view?

- 6.2 Policy SP1 contained within the existing Plan for Stafford Borough broadly addresses the requirements of the NPPF. It is considered appropriate to retain a policy committing the Council to applying the presumption of sustainable development within any new Plan for the Borough to 2040. The continuation of such a policy is therefore recommended by Richborough Estates.

Question 5.B: 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? Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

- 6.3 The preparation of the EDHNA is noted by Richborough Estates. The approach taken in the EDHNA to consider a range of scenarios and accelerated headship rates is supported, particularly in respect of the consideration of balancing housing delivery with economic growth likely to be experienced and supported through the aspirations of the Borough.
- 6.4 Scenario A, which represents the Standard Method, relies on the SNHPs which draws from past trends.
- 6.5 The Government confirms the use of the 2014 Sub-National Household Projections to provide the demographic baseline for the assessment of housing need in the short term and the Government's intention to review the formula and consider amending the method in the longer term. The baseline figure represents a minimum figure and does not account for additional housing demand that may arise as a direct result of economic growth during the plan period. Furthermore, it does not include meeting housing needs arising from neighbouring authorities.
- 6.6 It represents a position that does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have

- on demographic behaviour, including meeting cross-boundary needs. Richborough Estates therefore does not consider that this represents the most appropriate annual housing requirement for Stafford Borough.
- 6.7 Scenario's B and C represent a housing requirement that is lower than the Standard Method. There are no exceptional circumstances that can be demonstrated in Stafford Borough to justify an annual housing requirement below the Standard Method. Richborough Estates therefore consider it is appropriate for these two scenarios to be discounted.
- 6.8 Scenarios D, E, F and G apply different jobs growth assumptions. The EDHNA recognises that the *"jobs projections, modelled in PopGroup, suggest that there would have to be an uplift to the demographic baseline if the employment growth /policy-on forecasts are to be realised, ranging from 435 dpa (Scenario D CE Economic Forecasts) to 683 dpa (Scenario F Past Trends Jobs Growth). These equate to between 489 dpa and 746 dpa incorporating PCU rates."* Options D to G are the only options to require a level of housing growth similar or higher than the those set out in the current Plan for Stafford Borough.
- 6.9 Richborough Estates agrees there is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment. In addition, if the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing. Jobs growth and housing growth are intrinsically linked and should be balanced to ensure a sustainable strategy to 2040.
- 6.10 Whilst COVID-19 might bring short-term economic uncertainty it has to be remembered that the Plan period is to 2040 and Government initiatives (such as furlough) are designed to try and lessen a downturn in the longer term. It should therefore not hinder the Council's future growth aspiration when looking across the Plan period to 2040.
- 6.11 Scenario D utilises the CE Baseline and represents a level of jobs growth that is significantly lower than past trends in jobs growth in the Borough and does not reflect the Council's future growth aspirations. Richborough Estates consider that this should therefore be discounted.

- 6.12 Scenario E assumes the delivery of a new Garden Community which would attract £750k of Government funding to develop detailed plans for key infrastructure such as highway improvements, schools, water and energy provision. It also assumes delivery of a major development proposal at Stafford Station. In total these proposals are assumed to create an additional 12,500 new jobs in the Borough. If both a Garden Community and the Stafford Station Gateway projects are pursued it is considered appropriate to utilise this scenario as an absolute minimum to guide the housing requirement. Despite this, jobs growth should also be considered beyond a Garden Community and the county town of Stafford.
- 6.13 Scenario F reflects the jobs growth that has been experienced within Stafford Borough in the past (2000 to 2018). The EDHNA concludes that *"it is considered, given the current economic climate, that this rate of jobs growth is unlikely and would not be able to be sustained over the Plan Period. It is recognised that the current period is one of considerable economic uncertainty, in part as a result of Brexit, and that this may change, leading to more favourable economic conditions."* Richborough Estates would disagree with this conclusion on the basis that past jobs growth included a significant period of economic uncertainty, namely a prolonged recession, and fails to take account of the 12,500 additional jobs that could be created through the Stafford Station Gateway and a new Garden Community contained within Scenario E.
- 6.14 Scenario G (CE Baseline + 50% scenario) considers an intermediate level of jobs growth between Scenario D and Scenario F, *"reflective of jobs growth associated with the development of Stafford Station Gateway but not including jobs associated with a potential New Garden Community development."* This scenario appears arbitrary in assuming that the Council's economic growth aspirations will not be met without a Garden Community and that any growth over and above the baseline would only be attributable to Stafford Station Gateway. Richborough Estates considers this approach to be flawed.
- 6.15 Richborough Estates considers that the most appropriate Scenarios are Scenario E and F. Scenario E should be utilised as an absolute minimum if a Garden Community proposal were to be pursued. In addition, Richborough Estates considers that a level of economic growth that reflects past trends jobs growth is achievable over the plan period.

- 6.16 Richborough Estates would also support the inclusion of partial catch-up rates in respect of headship rates, to ensure that household formation rates suppressed in the past are rebalanced looking to the future.

Question 5.C: In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid 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 explain your reasoning.

- 6.17 The Housing Requirement figure for the New Local Plan should be expressed as a total figure without discount as the New Local Plan will replace the current Plan for Stafford Borough.
- 6.18 It is logical that existing uncommitted allocations or other sites relied upon to deliver homes by 2031 may contribute to this housing requirement. However, any existing site that is to be relied upon should be subject to the same scrutiny and assessment as any other 'reasonable option' being promoted through the Local Plan Review process. Any site deemed to be available, suitable and achievable and determined to be deliverable or developable should then inform a Borough wide trajectory for the period 2020-2040.
- 6.19 Through the Local Plan Review it is considered essential to review all sources of housing supply, including existing commitments. Whilst it is recognised that the Plan for Stafford Borough was only completed in 2017, further information or evidence may have arisen since adoption that raises questions of suitability or delivery of sites allocated.
- 6.20 All potential sources of supply should be scrutinised through the Local Plan Examination in Public, especially non-allocated windfall sites, and it is recommended that a site-specific housing trajectory is prepared to support the Preferred Options consultation. This should provide delivery assumptions in respect of any proposed preferred option allocation i.e. build out rates and lead in times.
- 6.21 If sites currently relied upon for delivery prior to 2031 no longer represent a deliverable or developable proposition or there are more appropriate alternatives in line with a new spatial development strategy, they should be removed from the supply and the emerging Local Plan as appropriate.

- 6.22 Richborough Estates consider that it is highly unlikely that a future supply of 6,000 homes can be demonstrated in Stafford Borough to 2031 through existing planning commitments and uncommitted allocations.

Question 5.D: Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy? Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

- 6.23 Richborough Estates is concerned that the new settlement hierarchy reduces the role of Weston to a 'medium' rather than a 'key' settlement. Weston is a sustainable village with good connections to other services by public transport, and this should be recognised when decisions are made about the distribution of development, particularly as development can help sustain services and facilities and this ensure the vitality of rural villages into the future. Indeed, this is recognised through the proposal to designate Land East of Weston as a Garden Community, and the services, facilities and transport connections of the village would be well placed to serve this.

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?

- 6.24 Whilst Richborough Estates has no particular view on whether built-up areas to the north of the Borough should be included within the settlement hierarchy, inclusion in itself, should not determine whether these areas should form part of the spatial development strategy for delivering growth. Development within this area should have regard to any cross-boundary requirements related to Stoke-on-Trent and Newcastle-under-Lyme in particular and should recognise that non Green Belt opportunities are suitable for development elsewhere in the Borough, including Weston.

Question 5.F: In respect of these potential scenarios do you consider that all reasonable options have been proposed? If not, what alternatives would you suggest? Are there any of these spatial scenarios that you feel we should avoid? If so, why? Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer.

6.25 Richborough Estates considers that all reasonable potential spatial scenarios have been identified, however it is recognised that some of these options are not mutually exclusive. In addition, it is considered that the Garden Communities scenario and Intensification of Town and District Centres are not appropriate to be pursued in isolation.

6.26 It is important that a range of sites across a wide geographical area would provide greater certainty for delivery. Richborough Estates considers that the spatial distribution of growth should be driven by sustainability and the existing settlement hierarchy where possible to support the enhancement of sustainable communities.

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

6.27 The NPPF recognises that planning for larger scale developments such as new settlements or significant extensions to existing towns may be the best way to achieve future supply, provided it is well designed, located and provided with the necessary infrastructure and facilities.

6.28 The Greater Birmingham HMA Strategic Growth Study sets out a number of social and community infrastructure assumptions for new towns/settlements which may be relevant, as follows:

- *"mixed-tenure home and housing types;*
- *employment land provision sufficient to meet aspiration of self-containment;*
- *include integrated health care practice or practices;*
- *include provision of primary school(s) and secondary school;*
- *include provision of local centres to meet everyday convenience shopping needs and provision of 'town centre' incorporating a range of comparison and convenience stores;*
- *provide facilities for community/cultural activities;*

- *uses zero-carbon and energy-positive technologies;*
- *provide coordinated recreational and sporting facilities (including a swimming pool) that meet the needs of the development;*
- *delivery of comprehensive green infrastructure within the new settlement.”*

6.29 Land East of Weston, including the two options being promoted by Richborough Estates, already has excellent local access to local services and facilities, some of which are already present in the settlement and some of which can easily be accessed by public transport. This is addressed in more detail in the site-specific section of these representations, which demonstrates clearly the sustainability both of this location and of this proposed option.

6.30 **Question 5.H: Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community/Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)? If you do not agree, what is your reasoning? 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.**

6.31 Richborough Estates considers that Growth Options 2, 3 and 5 are compliant with the NPPF

6.32 Option 1 would lead to an unbalanced strategy which limits the ability of smaller settlements to adapt and change, potentially having a negative impact upon their sustainability.

6.33 Option 2 would allow for a range of sites to be identified within the Local Plan across a wide geographical area. This would be further increased through the support of local communities in the preparation of Neighbourhood Development Plans where local, organic growth would be supported.

6.34 Option 3 would disperse development to a range of settlements allowing for a balanced spatial strategy which helps deliver growth across towns and villages to meet both strategic and more localised needs.

- 6.35 Option 4 would again potentially lead to an unbalanced strategy although the principle of garden communities in the correct location as part of the spatial distribution is supported.
- 6.36 Option 5 replicates Option 3 with the additional inclusion of a new Garden Community, the consideration of which complies with NPPF paragraph 72.
- 6.37 Option 6 seeks to maximise the benefit of the existing transport network and other infrastructure, however, Richborough Estates propose that this is likely to lead to undesirable ribbon development.
- 6.38 Richborough Estates consider the most appropriate and balanced approach to distributing growth to be Option 2, 3 or 5.

Question 5.I: Do you think that it is appropriate, in order to take the development pressures 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.

- 6.39 With regard to the delivery of at least one Garden Community, the principle of this is supported as this complies with paragraph 72 of the NPPF. It is important that the right Garden Community is selected however, to maximise opportunities from existing services, facilities and connections rather than requiring large amounts of new infrastructure. The chapter on site specific detail shows that land East of Weston is ideally placed in this regard.

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

- 1. Growth Options Scenario (A, D, E, F, G)**
- 2. Partial Catch Up**
- 3. Discount/No discount**
- 4. No Garden Community/Major Urban Extension**

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

- 6.40 In light of the economic growth aspirations of the Borough and the affordable housing need, Richborough Estates considers Growth Option Scenario F is the most appropriate option.
- 6.41 Richborough Estates supports the approach to partial catch-up in respect of headship rates to ensure past household suppression is not forecast into the future.
- 6.42 Richborough Estates recognises that a committed supply of housing land will play a role in meeting the housing requirement between 2020 and 2040, however it will be necessary for the Council to ensure robust scrutiny of this supply and subject any uncommitted housing allocation to the same assessment as alternative site options through the plan-making process.
- 6.43 Richborough Estates does not consider it is absolutely necessary for the Council to rely on the delivery of a new Garden Community to meet an appropriate housing requirement for the Borough, however it is certainly a feasible element of a balanced spatial strategy if the right opportunity is taken. It is important that the right Garden Community is selected, to maximise opportunities from existing services, facilities and connections rather than requiring large amounts of new infrastructure. The chapter on site specific detail shows that land East of Weston is ideally placed in this regard.

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.

- 6.44 Richborough Estates agrees with an assumption being incorporated within the EDHNA to take account of future losses of employment land.

Question 5.M: Should the New Plan broadly mirror the spatial distribution of new employment prescribed by the current Plan? If not, what would you suggest and on what basis?

- 6.45 Richborough Estates consider housing growth and jobs growth are intrinsically linked. To ensure balanced and sustainable communities, housing growth should be focused to locations where job opportunities are present, having regard to not only planned employment allocation, but existing employment generating uses. Weston has easy access to such opportunities both locally and via sustainable transport links.

Question 5.0: Are there any 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.

- 6.46 Richborough Estates has submitted information in respect of land south of Weston through the “Call for Sites” process.

7. DELIVERING HOUSING

- 7.1 Section 8 of the consultation document considers housing delivery, recognising that the provision of a housing market which reflects the needs of all members of the community is a key objective of plan making.
- 7.2 Richborough Estates seeks to raise a number of views in respect of housing delivery which are intended to be helpful in guiding policy.

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

- 7.3 Whilst the NPPF at paragraph 117 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 or 'brownfield' land*" it falls short of requiring a brownfield first policy. The plan-making process must recognise the importance of identifying greenfield sites to ensure an appropriate housing requirement can be met within the Plan period and to ensure the Local Plan is deliverable. This is highlighted by the Council's Brownfield Register which identifies brownfield sites that could yield approximately 800 dwellings, noting that these are all consented.

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

- 7.4 Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance, however, the introduction of a Borough-wide minimum density standard is not supported. Instead, it is necessary for sites to be considered on a site-by-site basis, having regard to local character, context and other planning policy requirements or environmental designations or constraints.
- 7.5 As Stafford Borough is very diverse in terms of housing density across the Borough it is therefore considered that if density standards are incorporated within the Local Plan Review, then these should be minimum standards determined by reference to the character of the local area and the housing mix as determined by local needs. In accordance with national guidance the Council may wish to consider a variety of density standards for different locations.

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

- 7.6 Richborough Estates recognise that it may be appropriate to adopt a higher minimum density within town centre locations, where the opportunities to access sustainable travel options is most prevalent.

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?

- 7.7 Richborough Estates supports the provision of a range of dwelling types to assist in the provision of attractive and sustainable developments and to assist in contributing towards a balanced housing market.

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?**

- 7.8 Richborough Estates maintains a position that the acceptability of dwelling design and provision of external spaces should be considered on a site-by-site basis.

- 7.9 The NDSS was published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.

- 7.10 In introducing the standards, the Written Ministerial Statement outlines:

'New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a

simpler, streamlined system which will reduce burdens and help bring forward much needed new homes.'

- 7.11 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

'From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy.'

- 7.12 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

'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 National Planning Policy Framework and Planning Guidance.'

- 7.13 The reference to the National Planning Policy Framework relates to paragraph 174 which states:

'Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence.'

- 7.14 The reference to the National Planning Guidance relates to the following:

'Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.’*

7.15 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability. If the Council were to consider introducing such a requirement, further evidence is necessary.

7.16 Regarding need, no justification or evidence is provided and until it is the NDSS should not be applied to any site on the premise it would be unsound. Richborough Estates consider there is unlikely to be any local circumstances within Stafford Borough that would support such an imposition of the Nationally Described Space Standards (NDSS).

7.17 Regarding viability, there is an intrinsic link between the affordability of a property and its size (in floorspace) typically expressed as a cost (£) per square metre (or square foot). Should the NDSS be implemented within Stafford Borough, the building costs would increase, and these additional costs would be offset by the increase in market value, estimated to be in the order of 10%.

7.18 Therefore, artificially increasing the floor area of properties to achieve NDSS standards would serve the purpose of ‘pricing out’ a number of potential purchasers that have a current housing need. This is despite local evidence justifying a significant affordability issue being present within the Borough.

7.19 The imposition of NDSS should not be required on any site unless it is further justified on grounds of viability.

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?

- 7.20 Richborough Estates considers that it is most appropriate for housing mix to be guided by market signals, as defined within the most up-to-date assessment of needs. The assessment of needs should be routinely updated across the 20-year Plan Period. This ensures that housing mix is reflective of market-driven need.
- 7.21 Richborough Estates does however recognise the recommended range provides a good level of flexibility to allow for changing market signals across the Plan period and in different locations within the Borough. It is therefore considered sufficient in terms of ensuring the needs of all members of the community can be met.

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?

- 7.22 Richborough Estates considers the existing housing stock within Weston to be balanced however recognises the current demand for smaller 2 and 3 bed properties across the Borough.

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

- 7.23 If the Council wishes to adopt the higher optional standards for Part M Category 2 and 3 then this should only be done in accordance with the NPPF (para 127f & Footnote 46). The Written Ministerial Statement (WMS) dated 25th March 2015 stated 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.*" Richborough Estates considers that this suggested policy requirement has not been justified by the evidence base available at present.

Question 8.I: 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? Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens? Is

**there a need for bungalows to be delivered in both urban and rural areas?
Are there any other measures the Council should employ to meet the
demand for specialist housing within the Borough of Stafford?**

- 7.24 It is considered that the need to deliver specialist housing, including bungalows, should be guided by demand and market signals, through an up-to-date evidence base. It would be inappropriate to impose a Borough-wide percentage provision for bungalows, the demand for which varies geographically.
- 7.25 If bungalows are to be provided within a scheme, it would seem logical to reduce garden sizes or allow for the provision of communal/shared gardens to ensure efficient use of land and to reflect any desire from the market for low-maintenance external amenity areas. This approach is also likely to align to any appropriate space about dwellings requirements which should reduce the necessary distance between principal facing windows for ground floor windows, where intervening boundary treatments would interrupt views.

**Question 8.J: Do you consider that there is no need for additional provision
of student accommodation within the Borough?**

- 7.26 Richborough Estates has no view on whether additional provision for student accommodation is required, however, any provision should not contribute towards the annual housing requirement.

**Question 8.K: Do you consider an affordable housing provision of between
252 and 389 units per annum to be achievable? 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?**

- 7.27 The level of affordable housing provision that is achievable will be intrinsically linked to the annual housing requirement established through the Local Plan review and overall plan viability having regard to all other policy requirements sought.
- 7.28 Utilising the highest annual requirement of 746 dwellings per annum set out in Scenario F, the affordable housing requirement would represent between 34% and 52% of all homes delivered. Based upon the annual housing requirements set out through the EDHNA, Richborough Estates consider that an affordable housing provision of 389 per annum is unachievable. It is also relevant that the highest level of annual affordable homes delivered within the Borough through the current

Plan period equated to 343 dwellings in 2016/17 based on a total of 1,010 dwellings (34% of all completions).

- 7.29 Richborough Estates is of the opinion that a target of 252 affordable homes per annum is only like to be achievable if a housing requirement in line with Scenario F, as a minimum, is pursued. This would require a continuation of an affordable housing requirement of between 30% and 40% on qualifying sites and this would need to be balanced with other policy requests through an assessment of viability.

Question 8.M: In order to help maintain the potential supply of land for rural affordable housing should the Council, where development has not yet commenced, convert existing Rural Exception Site Planning Permissions to Rural Affordable Housing Site Allocations?

- 7.30 The NPPF defines Rural Exception Sites as "*small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.*" As these sites represent sites that would not normally be used for housing, in the large part due to the sustainability of locations, and represent sites that should not be relied upon in meeting the overall housing requirement, Richborough Estates consider an approach to convert these permissions to site allocations through the Local Plan to be unsound. The suitability and deliverability of these unimplemented permissions should be subject to the same level of scrutiny and assessment as all other reasonable sites contained within the SHELAA, having regard to the spatial development strategy.

Question 8.N: 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? Should the Council allocate plots for the purpose of self-build throughout the Borough?

- 7.31 In terms of the requirement for all major housing development proposals to provide evidence that they have fully considered the provision of self/custom build within the overall housing mix on site, from an urban design/ masterplanning perspective, the integration of a number of self builds into a scheme being delivered by a volume housebuilder (that often work on standard house types) would possibly be difficult to achieve in respect of both making an efficient use of land; and to achieve design

consistency. Further, sites currently being put forward by developers have been negotiated on the basis of existing planning policies and values and such an addition could impact on viability. It is recommended that further work be commissioned in order to find out where households would like to have the opportunity to undertake a self and custom build, so that the planning policies can better provide for the need rather than simply asking developers of all large sites to offer land.

- 7.32 In addition, the Council's own evidence base does not appear to fully justify a need for self/custom build properties to be considered on all sites over 100 dwellings. In October 2019 only 45 people had registered. This evidence does not support the Council's suggested approach.
- 7.33 A key priority of the Government is to boost the supply of housing by a variety of means to meet the varied housing needs of people across the UK. Self-build and custom housebuilding have been identified as a significant element of the Government's agenda to increase housing supply. The NPPF gives explicit support to policies which would plan for a mix of housing based on the needs of different groups in the community, including people wishing to commission or build their own homes. In addition, paragraph 61 of the NPPF sets out that Local Planning Authorities (LPAs) have a duty to assess the local demand for self-build plots and must also make provision for that demand.
- 7.34 With regard to facilitating the provision of self-build and custom build housing within Stafford Borough, the identification of specific sites for such development is favoured, as this option would have a greater chance of ensuring that the needs of local people wishing to build their own homes are met. It is recommended that these sites are specifically allocated as self-build/custom build housing sites within the Local Plan Review document.

8. DELIVERING QUALITY DEVELOPMENT

- 8.1 Section 9 of the consultation document relates to the quality of development. Richborough Estates seeks to provide views in respect of blue and green infrastructure, landscape and general design guidance.

Question 9.A: Should the Council have a separate policy that addresses Green and Blue Infrastructure? Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?

- 8.2 The importance of green and blue infrastructure is, unquestionably, important in delivering good design and ensuring that it reaches beyond the site linking to areas beyond. However, caution should be exercised in being too prescriptive as sites and their contexts will vary. Notwithstanding this, it is important that opportunities for linkages are maximised and clearly articulated, through an evidence-based approach which is then clearly shown on a policies map to provide certainty.

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 team?

- 8.3 Policies must be prepared in conformity with the NPPF, paragraph 174 which states that plans should:
- A. identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation and;
 - B. promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Question 9.C: Should the new Local Plan continue to protect all designated sites from development, including maintaining a buffer zone where appropriate? Encourage the biodiversity enhancement of sites through

development, for example, allocating sites which can deliver biodiversity enhancements? Require, through policy, increased long-term monitoring of biodiversity mitigation and enhancement measures on development sites?

- 8.4 Paragraph 175 of the NPPF sets out the approach for considering planning applications in the context of habitats and biodiversity so the Local Plan must conform to this. It should be borne in mind that well designed developments can enhance biodiversity so the policy should contain wording which allows this to happen.

Question 9.D: How should plan policies have regard to the new AONB Management Plan and Design Guidance?

- 8.5 Where relevant, the Local Plan should contain a clear hook to the AONB Management Plan. However, the Management Plan has a different legal status, therefore any policies which are to be drawn through which would be used in the setting of Local Plan policy or used as a material consideration in the determination of planning applications should be made very clear so that they can be consulted upon through the Local Plan process.

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

- 8.6 This approach is supported.

Question 9.F: Should the Council consider a policy requirement that new development take an active role in securing new food growing spaces? 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.**

- 8.7 This approach is supported in principle but should not be used to preclude or block development, but to help inform good design which incorporates applicable elements as set out above. Furthermore, monitoring will be essential as evidence of demand will be needed to inform local specifics for example whether there is need for allotments (local waiting lists or underused plots for instance).

Question 9.G: Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting?

- 8.8 Provided that the context is clearly justified it would be sensible and appropriate to include positively worded policies which would require an LVIA to accompany and inform development proposals; unless they were part of an allocated site and then potentially only a LVA would be required as those sites will have already been tested through the Local Plan Examination.

Question 9.H: Do you consider there are areas in the Borough that should have the designation of Special Landscape Area? If so, explain where.

- 8.9 Case law has considered the issue of landscape value and what it means for a landscape to be valued. *Stroud DC vs. SSCLG [2015] EWHC 488 (Admin)* is clear that, whilst valued landscapes do not need to have a formal designation, 'valued' means something more than just 'popular'. Landscape is only 'valued' if it has physical attributes which take it out of the ordinary.
- 8.10 The Landscape Institutes' Guidelines for Landscape and Visual Impact Assessment ('the GLVIA') identifies various factors that may be relevant in the assessment of landscape value, including:
- Condition/Quality,
 - Scenic Quality,
 - Rarity and Representativeness,
 - Conservation Interests,
 - Recreation Value,
 - Perceptual Aspects; and

- Cultural Associations.

8.11 Richborough Estates considers that further evidence is required if further designations are sought to determine landscape is 'special' or 'valued'. This should be evidenced having regard to the above criteria.

Question 9.J: Do you consider that the current "Design" SPD provides sufficient guidance for design issues in the Borough? Please explain your rationale.

8.12 The Design SPD is considered to provide sufficient guidance however, Richborough Estates considers this should be updated to reflect the National Design Guide, published in October 2019.

Question 9.L: To support a new Local Design Review Panel should the new Local Plan:

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

8.13 Richborough Estates considers if particular standards are already required at the national level there is no need to reiterate them locally as it is better to refer to them via a general policy hook, which would then be more flexible if the national context changes.

8.14 In relation to design and sustainability standards, it is acknowledged that the Code for Sustainable Homes has been withdrawn by the UK Government. However, it is noted that the BREEAM sustainability assessment can still be used, for new residential, as well as other buildings. In light of the fact that there is no mandatory requirement for many of the identified standards it is considered that this should be left to the discretion of the developer, rather than included within local planning policy. Indeed, as Paragraph 150 b) of the NPPF states, any local requirements for

the sustainability of buildings should reflect the Government's policy for national technical standards.

- 8.15 In respect of a design review panel, it is not considered their opinion can be used as a material consideration in the determination of a planning application. It is not unusual for design policies to be interpreted in different ways but still arriving at an effective design solution which is policy compliant. Even if a design review panel disagree with a development proposal, that does not mean it is an inappropriate from of development if it satisfies the design policies.

Question 9.M: Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?

- 8.16 Richborough Estates considers that it is not necessary to designate Local Green Spaces through the new Local Plan. As these spaces are "*green areas of particular importance to local communities*" (ID: 37-005) it may be more appropriate to allow identification through the Neighbourhood Planning process.
- 8.17 In determining Local Green Spaces, regard must be had to the spatial development strategy to ensure they would not undermine the Local Plan's aim to "*identify sufficient land in suitable locations to meet identified development needs*" (ID: 37-007).

Question 9.N: Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so where? Are there any other Borough-wide facilities you feel should be associated with open space? Are there any settlements that you believe are lacking in any open space provision? Should the Council seek to apply Play England standards to new housing developments? Should the Council seek to apply Fields in Trust standard to providing sports and children's facilities? Should the Council seek to apply Natural England's ANGSt to new development? Should the Council seek to develop a bespoke standard in relation to open and/or play space? Do you consider that developments over 100 houses should incorporate features that encourage an active lifestyle for local residents and visitors? Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure? Should the Council require all high density schemes to provide communal garden space?

8.18 Richborough Estates considers that policy must be capable of being flexible to support the local context. Thresholds seem rather arbitrary and therefore Richborough Estates suggest it would be more appropriate to ensure that developments are prepared in line with a design framework; one which references good practice and guidance which may well be subject to change throughout the Plan period.

Question 9.0: Should the Council seek to designate land within the new Local Plan 2020-2040 to address Borough-wide shortage of new sporting facilities? Identify within the new Local Plan the site in which a new swimming pool should be developed?

8.19 Richborough Estates consider all policies and proposals will need to demonstrate deliverability, and any future requirements will need to be justified in order to provide certainty in terms of compliance with Regulation 122 of the CIL Regulations and the need for developer contributions should these be required. Further evidence will be required in respect of new sporting facilities as the plan progresses and this should be informed by any corporate strategy prepared by the Borough Council.

9. ENVIRONMENTAL QUALITY

9.1 Chapter 10 focuses upon environmental quality including air quality, noise and light pollution, and the management of waste.

Question 10.A: The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the Council:

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

9.2 In terms of ensuring the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles, it is considered that more evidence is required. Whilst the principle is supported by Richborough Estates, and local plan policies can provide the context for supporting such change, this will also depend on further detail: for example is the infrastructure appropriate; can the grid support capacity in the area being developed; and, what is the impact upon viability and deliverability?

9.3 In terms of Air Quality Management Zones, again it is considered that further evidence is required. This evidence should consider the potential impact upon sites of biodiversity (given that these will vary) and whether such zones would achieve proposed outcomes.

Question 10.B: The currently adopted Plan for Stafford Borough does not enforce any policy to mitigate for the impact 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?

- 9.4 Again, Richborough Estates consider further evidence is required to show what the impact is likely to be and whether this impact arises as a consequence of proposed development (in order to justify the need for mitigation). Any mitigation strategy would also need to consider the effect upon Plan viability.

Question 10.C: The currently adopted Plan for Stafford Borough makes reference to waste management in Policy N2. However, the growing population of Stafford Borough and the need for further action to combat climate change suggests the employment of further, more stringent measures encouraging sustainable waste disposal is desirable. Therefore, should the Council:

- a) Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site?**
 - b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?**
 - c) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford Borough?**
- 9.5 Richborough Estates considers that much more detail is required, particularly as this potentially overlaps with the role of the County Council and the Waste Local Plan, which itself is also part of the Development Plan. The current Waste Local Plan, covering the period 2010 - 2026 was adopted in 2013 and was reviewed in 2018. It is due for a further review in 2023, 'unless an earlier review is deemed necessary due to significant changes in national policy and guidance, local circumstances or our strategic priorities'. The new Local Plan for Stafford Borough needs to ensure it is in conformity with the Waste Local Plan otherwise considerable confusion and uncertainty will arise.

10. LAND SOUTH OF WESTON

Site Proposals

- 10.1 These representations promote two options for land adjoining the southern edge of Weston.
- 10.2 The first, Option A, is a 1.55 hectare site which lies to the south of Green Road at its eastern end close to the junction with the A51. This is shown at **Appendix 1**. The second (Option B) is a larger site of 15.45 hectares which incorporates Option A but extends southwards along the settlement edge to the west and along the A51 to the east. This can be seen at **Appendix 2**.
- 10.3 Option A has a SHLAA reference WES03. Option B comprises two SHLAA sites, references WES02 and WES03 which combine to form the larger site proposal.

Option A: Land South of Green Road

- 10.4 The site comprises approximately 1.55 hectares of agricultural land to the south of Green Road, Weston. It has a frontage of approximately 95 metres to Green Road which lies to the north, this area is bordered on either side by residential properties. The site opens out to extend westwards behind the rear gardens of the properties in Green Road and to the rear of the village hall as far as Salt Works Lane. The southern edge of the site is bounded at the western end by a new housing development, with the majority of the remaining southern edge being formed by a field edge which looks out across open fields and across to the edge of Weston village to the south west. The A51 runs to the south east.
- 10.5 The SHLAA indicates a potential yield of around 33 dwellings for this site.

Natural Environment

- 10.6 The land is currently in agricultural use, with the entrance via an existing access off Salt Works Lane to the west of the site. It is identified as Grade 3 quality agricultural land on the Provisional Agricultural Land Classification map, however these maps are not suitable for establishing the detailed quality of individual sites. Further survey work can be undertaken as necessary in due course.
- 10.7 The site is located in Flood Zone 1, the area at least risk from flooding. The site is also flat and not constrained topographically.

10.8 There are some Tree Preservation Orders along the boundary of the site. These would be incorporated into any future development.

10.9 The site falls within a Minerals Safeguarding Area (Policy 3 of the adopted Minerals Local Plan 2015 – 2030). The safeguarded area is extensive, covering much of Staffordshire. Further evidence could be provided if required however because the site is adjacent to the existing settlement it is considered that minerals extraction would be highly inappropriate in this location.

Cultural & Heritage

10.10 The Staffordshire Historic Environment Record (HER) shows the line of an old tramway (HERS record MTS12319), which crosses part of the north western section of the site. The Trent and Mersey Canal Conservation Area lies beyond the site to the south west. There is a Grade II listed building known as 'Abbeylands', located approximately 400m north-west of the site.

Highways & Access

10.11 In terms of access, this is currently at the site's western boundary off Salt Works Lane, whilst there is the opportunity to provide an additional access off Green Road.

Sustainable Location

10.12 The site is sustainably located immediately adjacent to the Key Service Village of Weston. In terms of services, St Andrews C of E Primary School is located approximately 200m to the north of the site, whilst Weston also benefits from two public houses, a village hall and a church.

10.13 The site is therefore well located in terms of access to local facilities and services.

10.14 In terms of public transport, a number of bus services serve Weston, with stops being located at Old School Close and The Green. There are frequent services to Stafford and Uttoxeter, and this route includes stops in other villages (eg Hixon, Great Haywood) which have additional services such as GP practices. Weston Road Academy (high school) is easily accessible by bus, as are a range of sport and recreational facilities including swimming pools. Stafford and Uttoxeter also have rail services linking to major cities across the UK.

10.15 The site therefore benefits from significant opportunities to utilise transport modes other than the private car.

10.16 Further technical information will be undertaken as required to help inform the plan-making process.

Demonstrating Deliverability

10.17 The NPPF (2019) sets out the definition for deliverability in the glossary. This states that 'to be considered deliverable sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years'. The paragraphs below demonstrate how the site is suitable, available and achievable to accommodate residential development.

Availability

10.18 Through the continued promotion of this site, the landowner has demonstrated that they are supportive of the development of the site to deliver much needed new homes.

10.19 As such, this submission confirms that there is nothing to prevent this site from being delivered immediately.

10.20 The site is therefore clearly available.

Suitability

10.21 The site is well located in terms of its functional relationship with the key service village of Weston, as it is surrounded by residential development on three sides and therefore a logical extension to the village's built form. The site has also been demonstrated to be sustainable and is well placed to ensure that future residents would have access to a diverse range of services and facilities, representing an opportunity to deliver a cohesive, sustainable community that acts as a natural and logical extension to Weston.

Achievability

10.22 It has been demonstrated that there are no constraints which would preclude the development of the site.

10.23 In terms of access, an existing access exists at the site's western boundary off Salt Works Lane, whilst there is the opportunity to provide an additional access off Green Road.

10.24 It should be noted that an outline application for residential development was refused for this site on 27th April 2015 (14/21452/OUT). This was because, at the time, the Council had delivered sufficient development in its key rural settlements and any more would have exceeded the proportion of development allocated to this tier of the settlement hierarchy through the adopted local plan. Clearly through a review of the plan this situation could change. The second reason for refusal was a technical reason relating to an inadequate drainage strategy submitted as part of the application, which could easily be overcome.

10.25 The site is clearly not subject to any major physical constraints which would prevent development from being achieved.

Summary: Option A

10.26 To conclude, Land South of Green Road, Weston, is a greenfield site located in a sustainable location adjoining the key service village of Weston. It has been demonstrated that the site is available, suitable and deliverable within five years. It would provide an excellent opportunity to deliver dispersed development to the edges of sustainable communities as part of a balanced spatial strategy which, in line with the NPPF, avoids the need to utilise Green Belt. It could therefore help to deliver growth options 2, 3 and 5.

Option B: Land South of Weston (Wider Site)

10.27 The site, which also encompasses the area covered by Option A, comprises approximately 15.45 hectares. It extends southwards along the settlement edge to the west and along the A51 to the east.

10.28 The site has a frontage of approximately 95 metres to Green Road which lies to the north, this area is bordered on either side by residential properties. The site opens out to extend westwards behind the rear gardens of the properties in Green Road and to the rear of the village hall as far as Salt Works Lane. The site then extends southwards to the rear of the new build residential properties in Salt Works Lane and along the Trent and Mersey Canal Conservation Area beyond. The site is bounded to the south east by open fields and the A51 runs along the north eastern edge.

10.29 The SHLAA indicates a potential yield of around 251 dwellings for this site.

10.30 An indicative masterplan for Option B is attached at **Appendix 3** which illustrates how a logical extension to the east of Weston incorporating approximately 160 dwellings could be delivered. If the Garden Village option at Weston were to be pursued as part of the development strategy, then the layout could be reconfigured to include further development in the area currently shown as a Country Park.

Natural Environment

10.31 The land is currently in agricultural use, with the entrance via an existing access off Salt Works Lane to the west of the site. It is identified as Grade 3 quality agricultural land on the Provisional Agricultural Land Classification map, however these maps are not suitable for establishing the detailed quality of individual sites. Further survey work can be undertaken as necessary in due course.

10.32 The site is located in Flood Zone 1, the area at least risk from flooding. The site is also flat and not constrained topographically.

10.33 There are some Tree Preservation Orders along the boundary of the site. These would be incorporated into any future development.

10.34 A small part of the south eastern edge incorporates a Site of Biological Importance which extends beyond the site to the south.

10.35 The site falls within a Minerals Safeguarding Area (Policy 3 of the adopted Minerals Local Plan 2015 – 2030). The safeguarded area is extensive, covering much of Staffordshire. Further evidence could be provided if required however because the site is adjacent to the existing settlement it is considered that minerals extraction would be highly inappropriate in this location.

Cultural & Heritage

10.36 The Staffordshire Historic Environment Record (HER) shows the line of an old tramway (HER reference MTS12319), which crosses part of the north western section of the site. A small part of the site to the south east has a HER reference MST13568 and applies to a medieval water meadow. The Trent and Mersey Canal Conservation Area lies beyond the site to the south west There is a Grade II listed building known as 'Abbeylands', located approximately 400m north-west of the site.

Highways & Access

10.37 In terms of access, this is currently at the site's western boundary off Salt Works Lane, whilst there is the opportunity to provide an additional access off Green Road (and/or potentially the A51).

Sustainable Location

10.38 The site is sustainably located immediately adjacent to the Key Service Village of Weston. In terms of services, St Andrews C of E Primary School is located approximately 200m to the north of the site, whilst Weston also benefits from two public houses, a village hall and a church.

10.39 The site is therefore well located in terms of access to local facilities and services.

10.40 In terms of public transport, a number of bus services serve Weston, with stops being located at Old School Close and The Green. There are frequent services to Stafford and Uttoxeter, the routes include other villages (eg Hixon, Great Haywood) which have additional services such as GP practices. Weston Road Academy (high school) is easily accessible by bus as are a range of sport and recreational facilities including swimming pools. Stafford and Uttoxeter also have rail services linking to major cities across the UK.

10.41 The site therefore benefits from significant opportunities to utilise transport modes other than the private car.

10.42 Further technical information will be undertaken as required to help inform the plan-making process.

Demonstrating Deliverability

10.43 The NPPF (2019) sets out the definition for deliverability in the glossary. This states that 'to be considered deliverable sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years'. The paragraphs below demonstrate how the site is suitable, available and achievable to accommodate residential development.

Availability

- 10.44 Through the continued promotion of this site, the landowner has demonstrated that they are supportive of the development of the site to deliver much needed new homes.
- 10.45 As such, this submission confirms that there is nothing to prevent this site from being delivered immediately.
- 10.46 The site is therefore clearly available.

Suitability

- 10.47 The site is well located in terms of its functional relationship with the key service village of Weston, as it forms a natural extension to the village, being partially bounded by existing residential development and further contained by the lines of the canal and the A51. The site has also been demonstrated to be sustainable in terms of its proximity to existing services and facilities with public transport providing links to further facilities and services. It also provides opportunity to provide substantial amounts of open space. The site would therefore be well placed to ensure that future residents would have access to a diverse range of services and facilities, representing an opportunity to deliver a cohesive, sustainable community that acts as a natural and logical extension to Weston.

Achievability

- 10.48 It has been demonstrated that there are no constraints which would preclude the development of the site.
- 10.49 An access to the site exists at the site's western boundary off Salt Works Lane, whilst there is the opportunity to provide an additional access off Green Road (and/or potentially the A51).
- 10.50 It should be noted that an outline application for residential development was refused for the northernmost part of this site (the area covered by Option A) on 27th April 2015 (14/21452/OUT). This was because, at the time, the Council had delivered sufficient development in its key rural settlements and any more would have exceeded the proportion of development allocated to this tier of the settlement hierarchy through the adopted local plan. Clearly through a review of the plan this situation could change. The second reason for refusal was a technical

reason relating to an inadequate drainage strategy submitted as part of the application, which could easily be overcome.

10.51 The site is not subject to any major physical constraints which would prevent development from being achieved.

Summary: Option B

10.52 To conclude, Land South of Weston (Option B), is a greenfield site located in a sustainable location adjoining the key service village of Weston. It has been demonstrated that the site is available, suitable and deliverable within five years. It would provide an excellent opportunity to deliver dispersed development to the edges of sustainable communities as part of a balanced spatial strategy which, in line with the NPPF, avoids the need to utilise Green Belt.

10.53 The site could, in this regard help to deliver Growth Options 2 and 3.

10.54 Growth Option 5 also recognises that Weston is a sustainable settlement, proposing Land East of Weston as an option for a Garden Community. Land South of Weston forms part of these proposals and is well placed to deliver such a scheme, being directly adjacent to the village, with easy, walkable connections to its services and facilities, and well served by public transport.

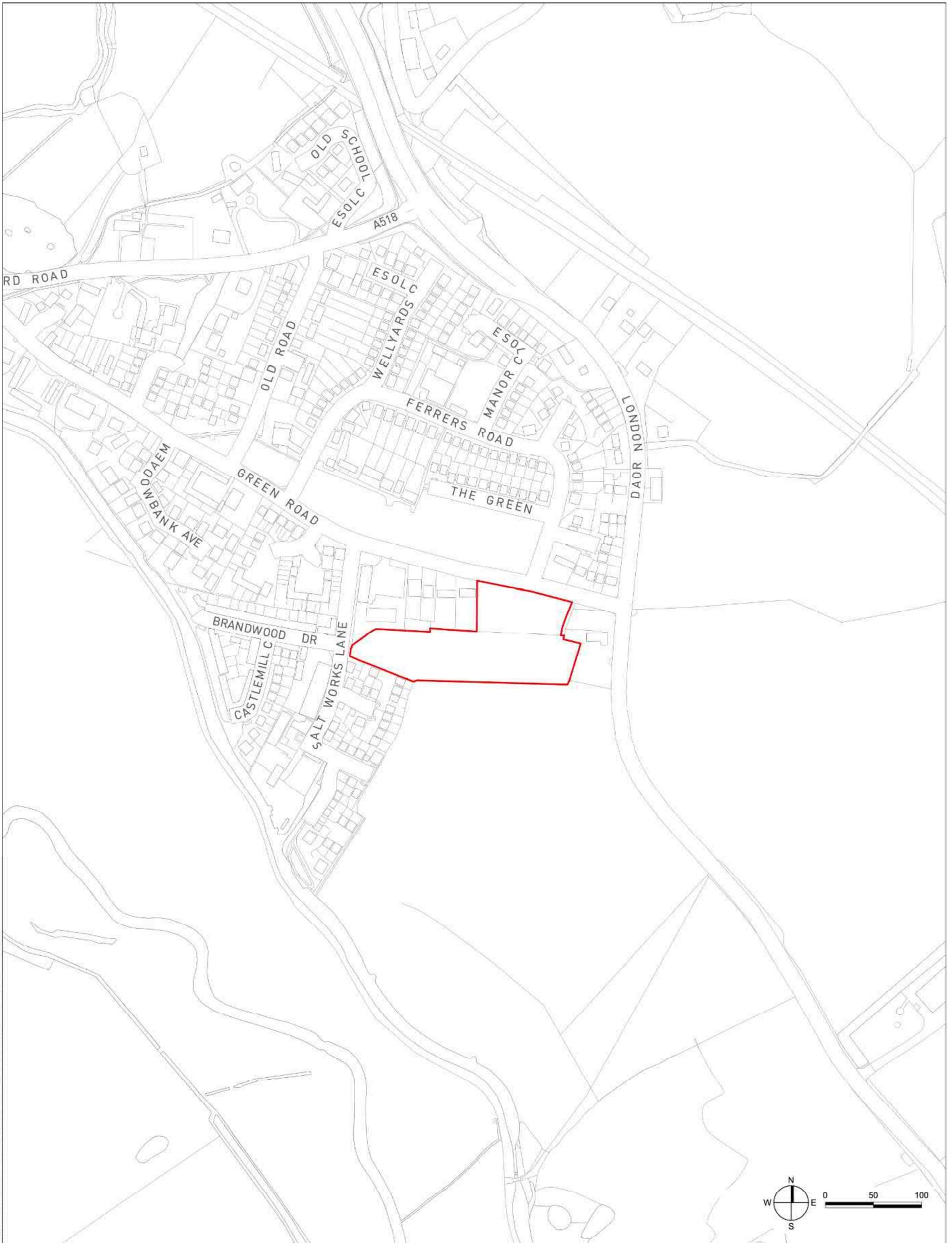
11. CONCLUSION

- 11.1 Richborough Estates supports Stafford Borough Council's decision to commence a review of the Local Plan. This provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 11.2 In respect of the vision and objectives, Richborough Estates considers that the review should seek to distil elements of the current vision and objectives that remain relevant to the Borough, into a concise overview of change sought to 2040.
- 11.3 In respect of emerging policy choices, it is recognised by Richborough Estates that further evidence will be required to support policy requirements and that elements of this further evidence will form an iterative part of the plan-making process to respond to the emerging growth requirements and spatial development strategy.
- 11.4 In respect of housing growth Richborough Estates considers Growth Option Scenario F is the most appropriate option. This scenario aligns to the economic growth aspirations of the Borough and the affordable housing need set out in the EDHNA. As part of this requirement Richborough Estates supports the approach to a partial catch-up in respect of headship rates to ensure past household suppression is not forecast into the future.
- 11.5 Richborough Estates recognises that an existing committed supply of housing land will play a role in meeting the housing requirement between 2020 and 2040, however it will be necessary for the Council to ensure robust scrutiny of this supply and subject any uncommitted housing allocation to the same assessment as alternative site options through the plan-making process.
- 11.6 With regard to the delivery of at least one Garden Community, the principle of this is supported by Richborough Estates as this complies with paragraph 72 of the NPPF. It is important that the right Garden Community is selected however, to maximise opportunities from existing services, facilities and connections rather than requiring large amounts of new infrastructure.
- 11.7 Land East of Weston is promoted by Richborough Estates as a suitable and sustainable location for residential development, representing a deliverable proposition, being available now and providing every prospect that homes can be delivered within the plan period. The site is aligned to the various spatial

development strategy options being considered by the Borough Council and would assist in delivering an appropriate housing requirement and supporting the economic aspirations of the Borough.

APPENDIX 1

SITE LOCATION PLAN OPTION A



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KEY
 SITE BOUNDARY
 1.53 HA / 3.79 ACRES



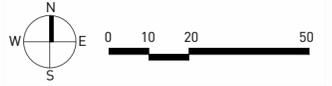
GREEN ROAD, WESTON - SITE LOCATION PLAN (OPTION A)

APPENDIX 2

SITE LOCATION PLAN OPTION B

APPENDIX 3

INDICATIVE MASTERPLAN



KEY DESIGN PRINCIPLES

1. Proposed vehicular and pedestrian access off Green Road;
2. Existing building line to be continued along site frontage and to face into existing Green;
3. Existing urban edge to be extended southwards and eastwards into the site;
4. Existing play area;
5. Building patterns to maintain outward view from gable of Bridge House;
6. Community Green and children's play area;
7. Natural play trail;
8. Dwellings offset a minimum of 21 metres from existing dwellings;
9. Tree lined verge;
10. Building patterns in alignment with existing patterns to reduce overlooking;
11. Focal point space;
12. Localised street narrowing across central corridor;
13. Reinstated field hedgerows;
14. Storm water drainage ditch/ swale;
15. Central green corridor;
16. Low density housing frontages;
17. Supplementary landscape;
18. Existing landscape;
19. Canalside walk;
20. Link to existing footpath; and
21. Emergency access via Saltworks Lane.

LEGEND

- Site location
31.66 Acres/
12.81 Hectares
- Residential development
- Public open space
- Proposed landscape
- Key pedestrian links
- Sustainable drainage



**LAND OFF GREEN ROAD, WESTON, STAFFORDSHIRE
PROPOSED INDICATIVE MASTERPLAN**

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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		
First Name		Mairead
Surname		Kiely
E-mail address		
Job title (if applicable)		Senior Planner
Organisation (if applicable)	St Modwen Homes Ltd (c/o Planning Prospects Ltd)	Planning Prospects Ltd
Address		
Postcode		
Telephone Number		

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

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

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

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

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

Please note:

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

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

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name Mairead Kiely		Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	4	Paragraph		Table
Figure		Question	4.A a) 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?	Other
2. Please set out your comments below				
<p>The Local Plan should require proposed developments to justify the approach they have taken in seeking to optimise energy efficiency, with the statutory building regulations as a base point. There should not be a blanket requirement to exceed building regulations as this will not be appropriate in all cases. This might be pursued via a requirement for proposals to be supported by statements explaining and justifying the approach to energy efficiency and other climate change mitigation measures, including considerations around viability.</p>				

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Mairead Kiely		Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	4	Paragraph		Table	
Figure		Question	4.E. Should the council implement a higher water standard than is specified in the statutory Building Regulations?	Other	
2. Please set out your comments below					
<p>The Local Plan should require proposed developments to justify the approach they have taken in seeking to optimise water usage, with the statutory building regulations as a base point. There should not be a blanket requirement to exceed building regulations as this will not be appropriate in all cases. This might be pursued via a requirement for proposals to be supported by statements explaining and justifying the approach to water use efficiency, including considerations around viability.</p>					

Part B: Your Comments

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

Name Mairead Kiely

Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)

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

Section	5	Paragraph	Table	Other
Figure		Question	5.C. In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031? If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)?	

2. Please set out your comments below

The new Local Plan should recognise large housing commitments in the Borough (such as the re-development of the former St Leonard’s works, off Fairway in Stafford).

A discount should only be applied to those dwellings with absolute certainty of delivery following the base date for the calculation, i.e. those under construction at that point. Existing committed permissions and uncommitted allocations should be retained where appropriate. This will avoid a shortfall of delivery and support the wider economic growth agenda for the new Plan as a whole.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Mairead Kiely		Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5.O. Are there any additional sites over and above those considered by the SHELAA that should be considered for development?	Other	
2. Please set out your comments below					
Call for Sites submission has been made for <i>‘Land east of Martin Drive, Castletown (west of former Castleworks site)’</i>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Mairead Kiely		Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	8	Paragraph		Table	
Figure		Question	8.A. Should the council continue to encourage the development of brownfield land over greenfield land?	Other	
2. Please set out your comments below					
<p>Yes, and the redevelopment of underutilised land within urban areas should be a priority. That said, it will remain important to ensure that a range of sites is brought forward to ensure that a full range of development requirements are met.</p>					

Part B: Your Comments

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

Name Mairead Kiely

Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)

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

Section	8	Paragraph		Table	
Figure		Question	8.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?	Other	

2. Please set out your comments below

The application of a minimum density threshold, whether on a blanket or ranged basis, is not appropriate. National policy objectives to make the best use of land whilst meeting identified need can be served through a requirement for individual proposals to justify their density through reference to local character, townscape and other relevant considerations. This will ensure that best use is made of every piece of land on an individual basis, rather than through reference to a threshold which might not be optimal for each specific site.

Part B: Your Comments						
<i>Please complete a new Part B for each representation you wish to make.</i>						
Name	Mairead Kiely		Organisation	Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?						
Section	8	Paragraph		Table		
Figure		Question	8.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?	Other		
2. Please set out your comments below						
<p>A policy requiring strict adherence to Nationally Described Space Standards would prevent certain types of housing coming forward, therefore limiting the variety of accommodation across the Borough. It would also not take account of any site-specific issues.</p> <p>The new Plan might more appropriately make reference to the Nationally Described Space Standards as a guideline for assessing development proposals.</p>						

Part B: Your Comments

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

Name Mairead Kiely

Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)

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

Section	8	Paragraph	Table	Other
Figure		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.	

2. Please set out your comments below

C. The new Plan should only make reference to the Nationally Described Space Standards as a guideline for assessing development proposals.

Part B: Your Comments

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

Name Mairead Kiely

Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)

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

Section	8	Paragraph	Table	Other
Figure		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?	

2. Please set out your comments below

There should be no blanket requirement for bungalows to be delivered on all major developments. Rather, individual developments should be supported by a statement providing justification for why the proposed housing mix has been selected.

Part B: Your Comments

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

Name Mairead Kiely	Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)
---------------------------	---

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

Section	8	Paragraph	Table
Figure		Question	Other
		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?	

2. Please set out your comments below

There should be no blanket requirement for serviced plots to be delivered on all major developments. Rather, individual developments should be supported by a statement providing justification for why the proposed housing mix has been selected, including the approach to providing serviced plots, making reference to evidence from the self-build register where appropriate.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Mairead Kiely		Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	9	Paragraph		Table	
Figure		Question	<p>9.L. To support a new Local Design Review Panel should the new Local Plan:</p> <p>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?</p> <p>b. To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc.</p> <p>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.</p>	Other	
2. Please set out your comments below					
<p>Part A - This is unnecessary, cumbersome, and will only serve to add a further level of delay and bureaucracy, yielding views which might conflict with those derived at the local level. Stafford Borough Council already has officers who are experienced, well qualified and best placed to provide this kind of advice.</p> <p>Part B – This approach risks creating a “shopping list” of generic requirements rather than one closely targeted at the specific, Stafford, setting.</p> <p>Part C - This approach offers the most in terms of delivering well designed places that</p>					

respond to the specific, Stafford, setting.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Mairead Kiely		Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	10	Paragraph		Table	
Figure		Question	10.A a) Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development?	Other	
2. Please set out your comments below					
Any requirements for EV charging should be addressed in accordance with other legislation (i.e. Building Regulations) if it is necessary and can be justified.					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Mairead Kiely	Organisation Planning Prospects Ltd (on behalf of St Modwen Homes Ltd)				
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	12	Paragraph		Table	
Figure		Question	12.D. a) Do you consider it is necessary to set local parking standards for residential and non-residential development ?	Other	
2. Please set out your comments below					
<p>Parking standards should be issued as guidance rather than as an absolute requirement, with individual development proposals given the opportunity to justify alternative levels of provision where appropriate. Garages should contribute towards parking provision where they have adequate functional space.</p>					

Please use a continuation sheet if necessary

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

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

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

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

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

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

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

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

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

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

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

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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title		Mr
First Name		Richard
Surname		Hesketh
E-mail address		
Job title (if applicable)		Director
Organisation (if applicable)	Legal & General Property	Quod
Address		
Postcode		
Telephone Number		

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

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

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

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

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

Please note:

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

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

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph	6.22	Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>The Issues and Options consultation document does not state how existing MDSs within the Borough will be retained or how their redevelopment will be facilitated.</p> <p>The plan should be amended accordingly in respect of the Hadleigh Park MDS and adjoining land.</p> <p>Please see the enclosed covering letter, ‘Employment Land Requirements’ Statement and the site layout plan for more details.</p>					

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

Please use a continuation sheet if necessary

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

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

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

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

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

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

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

Our ref: Q50165
Your ref:
Email: [REDACTED]
Date: 21 April 2020



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

By email only: forwardplanning@staffordbc.gov.uk

Dear Sir/Madam,

New Stafford Borough Local Plan 2020-2040 – Issues and Options Consultation Document (February 2020)

Representations on behalf of Legal & General

Hadleigh Park, Blythe Bridge

Further to our previous discussions with officers, I am writing on behalf of Legal & General Property (L&G) to submit representations to the Issues and Options Consultation for the New Stafford Borough Local Plan, which is due to conclude on 21 April.

In addition to this letter, please find enclosed in our submission the following three documents:

- Completed “Issues and Options” Consultation Response Form
- ‘Employment Land Requirements’ Statement (Quod; April 2020)
- Site Layout Plan (UMC Architects; Drawing 19244 F0001 Rev B)

Whilst at an early stage, L&G recognise the importance of the emerging New Stafford Borough Local Plan, as it will replace the existing Plan for Stafford Borough 2011-2031 (Parts 1 and 2). L&G have had previous discussions with the Council regarding Hadleigh Park and welcome the opportunity to continue this engagement.

Introduction

L&G is the long-term owner of the freehold for land in Blythe Bridge. The majority of this land comprises the Hadleigh Park site, a large brownfield site which is approximately 30 ha in size. As you are aware, the entire site is located within the Green Belt with the previously developed Hadleigh Park site being identified as a Major Developed Site (Policy E5 of the Plan for Stafford Borough) in The Plan for Stafford Borough 2011-2031 and Policies Map Insert 5. The golf course, sports pitches and open fields are located outside of the MDS.





Retention of Hadleigh Park MDS

The New Stafford Borough Local Plan acknowledges the existing MDSs within the Borough at paragraph 6.22. It states that the currently adopted policy E5 recognises a number of significant brownfield sites within the Green Belt which are encouraged for limited infill or partial or complete redevelopment for employment purposes, including Hadleigh Park.

Whilst it is understood that the Issues and Options consultation is considering a number of approaches to the level and distribution of development, the wording of the consultation document only seeks to ascertain whether there are any further MDSs in the Green Belt that should be considered for inclusion, and that otherwise the policy approach will remain unchanged. The policy wording does not explicitly state that the existing MDSs would be retained in the new Local Plan.

L&G requests that the existing MDS designation for Hadleigh Park is retained in the New Borough Local Plan in order to support appropriate redevelopment of the site.

Redevelopment of Hadleigh Park MDS

As officers are aware, the existing industrial and warehouse buildings are 40+ years' old, in poor condition, with restricted internal heights and inadequate servicing/delivery facilities. In essence, the buildings are considered to be obsolete and no longer meet the requirements of modern tenants.

L&G is keen to make the best use of this strategic brownfield site through comprehensively redeveloping it to provide a new business estate that comprises a range of warehouse/office buildings which meet the requirements of modern occupiers. This would help increase employment generation of the site and contribute further to the local economy. An indicative redevelopment scheme is shown on the enclosed Site Layout Plan.

L&G also considers that a more flexible policy approach would help facilitate redevelopment of the Hadleigh Park MDS and suggests that the following amendments (inserted text is underlined) are made the policy wording in the New Local Plan (on the basis that the wording of Policy E5 is carried forward):

"The following sites will be identified as previously developed sites(whether redundant or in continuing use, excluding temporary buildings) within the Green Belt, where limited infilling or the partial or complete redevelopment will be supported for a mix of employment-generating purposes consistent with Spatial Principle SP7, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development;

- *Hadleigh Park (Former Creda Works Limited), Blythe Bridge."*

Reallocation of Other Land

The enclosed 'Employment Land Requirements' statement (April 2020) analyses the principal 'evidence base' documents that relate to the Issues and Options Consultation Document, including the Strategic Housing and



Employment Land Availability Assessment (SHELAA) 2019 and the Economic and Housing Development Needs Assessment (EHDNA) 2019.

The statement concludes that evidence from recent take-up of land suggests up to 181 ha may be needed in the plan period, and the draft Local Industrial Strategy (LIS) sets out the case for major growth. In this context, the 128.9 ha of land identified in the New Local Plan is not sufficient to meet the NPPF requirement to proactively plan, meet anticipated needs, and allow flexibility for unanticipated needs. Furthermore, given the constraints identified by the SHELAA for site CRE02, it is not clear that the whole 128.9 ha is deliverable.

Because only three different employment sites are identified in the SHELAA, of which one accounts for nearly 90% of the area, delivery is particularly vulnerable to unanticipated delays. This does not meet the NPPF requirement to allow flexibility, nor does it satisfy the need (identified in the EHDNA) for a range of sites to increase the number of players in the market.

To ensure enough employment land to cover continued growth in demand, and sufficient flexibility and certainty of deliverability, additional sites will need to be allocated. Without this, the risk is that the Local Plan would be based on (and require) a slowing of growth, contrary to the ambitions of the LIS.

In order to help meet the identified employment land requirements of the emerging New Local Plan and to truly unlock the strategic nature of the site, L&G requests that the Council also considers removing the Green Belt designation from the area of land to the north of the MDS and reallocating this for employment-generation uses. This land is approximately 14 hectares in size and located immediately next to the existing settlement boundary with direct access to the highway network (see land edged purple on enclosed Site Layout Plan).

This reallocation would provide additional employment land to meet the current shortfall in the New Local Plan, ensuring that the future need is met and that the New Local Plan is sufficiently flexible and resilient to support employment growth and the local economy. The reallocation would also support the wider redevelopment prospects of the MDS site.

We would be very pleased to discuss these matters further with officers and provide any more information which may be helpful at this stage. Please let me know if you have any queries and we look forward to hearing from you.

Yours faithfully,

[Redacted signature]

Richard Hesketh
Director

cc. James Whitehill, L&G
George Shepherd, L&G

HADLEIGH PARK

EMPLOYMENT LAND REQUIREMENTS

1 Introduction

- 1.1 This note is prepared by Quod on behalf of Legal and General.
- 1.2 It summarises the current evidence on employment land needs in Stafford Borough. It is based on a review of the Strategic Housing and Employment Land Availability Assessment (SHELAA) 2019, and the Economic and Housing Development Needs Assessment (EHDNA) 2020.

2 Planning Requirements

- 2.1 Stafford Borough Council are consulting on the Issues and Options stage of preparing a new local plan. Guidance for plan preparation is set out in the National Planning Policy Framework (NPPF), and accompanying Planning Practice Guidance (PPG).
- 2.2 Paragraph 81 of the NPPF states that planning policy should:
 - “Positively and proactively” encourage sustainable economic growth
 - Identify sites “to meet anticipated needs over the plan period”
 - “Be flexible enough to accommodate needs not anticipated in the plan”
- 2.3 The PPG sets out how to identify need, taking account of (amongst other things):
 - Recent employment land take-up.
 - Local Industrial Strategies

3 Demand for Employment Land

- 3.1 The EHDNA looks at various forecasts for future employment land demand, and concludes that between 68 and 181 ha will be needed between 2020 and 2040.
- 3.2 The higher end of this range, 181 ha, is based on past employment land take-up, and therefore effectively represents a continuation of trend. The report notes that there has been high take-up in the last ten years, and rising in the past five years.
- 3.3 The Stoke-on-Trent and Staffordshire Local Enterprise Partnership has published a consultation draft Local Industrial Strategy (LIS). It sets out an ambitious vision for the area, which it sees as “a major UK growth opportunity”, which has “clear potential to grow further”. As part of that vision, they will work to “deliver the strategic employment sites we need to grow”.

4 Supply of Employment Land

- 4.1 From consultation with stakeholders, the EHDNA found “overall the view was there were more sites required across the Borough of a range of sizes to increase the number of active players in the market,” and that land at a New Garden Community could not be relied upon to meet the borough’s needs, given the timescales involved.

NOTE continued

- 4.2 The EHDNA noted from the SHELAA only three sites with potential for employment which together amounted to 128.9 ha.
- 4.3 The first, of 113.5 ha, was identified as deliverable. The SHELAA itself provides more detail on potential development sites. The deliverable 113.5 ha site is designated site CRE02, but it notes that the M6, which passes through the site without a junction, creates a physical barrier that would prevent the western section of the site being developed. It notes other potential constraints, including a mineral deposits buffer, and uncertainty over infrastructure/utilities.
- 4.4 The other two sites noted in the EHDNA are said to be developable subject to a review of the settlement boundaries, and total 15.4 ha. These are site STO01 (2.3 ha), which is suitable for retail and site HIX08 (13.1 ha), listed as suitable for employment.

5 Conclusions

- 5.1 Evidence from recent take-up of land suggests up to 181 ha may be needed in the plan period, and the LIS sets out case for major growth. In this context the 128.9 ha of land identified is not sufficient to meet the NPPF requirement to proactively plan, meet anticipated needs, and allow flexibility for unanticipated needs. Furthermore, given the constraints identified by the SHELAA for site CRE02, it is not clear that the whole 128.9 ha is deliverable.
- 5.2 Because only three different employment sites are identified in the SHELAA, of which one accounts for nearly 90% of the area, delivery is particularly vulnerable to unanticipated delays. This does not meet the NPPF requirement to allow flexibility, nor does it satisfy the need (identified in the EHDNA) for a range of sites to increase the number of players in the market.
- 5.3 To ensure enough employment land to cover continued growth in demand, and sufficient flexibility and certainty of deliverability, additional sites will need to be allocated. Without this the risk is that the Local Plan would be based on (and require) a slowing of growth, contrary to the ambitions of the LEP.



**SCHEDULE OF ACCOMMODATION
 (Gross Internal Area)**

Unit 1	
Warehouse Area	- 36,200 sq ft (3,363m ²)
Offices (Incl. GF Core)	- 3,600 sq ft (334m ²)
Total Area	- 39,800 sq ft (3,698m²)
Unit 2	
Warehouse Area	- 71,900 sq ft (6,680m ²)
Offices (Incl. GF Core)	- 7,150 sq ft (664m ²)
Total Area	- 79,050 sq ft (7,344m²)
Unit 3	
Warehouse Area	- 138,700 sq ft (12,886m ²)
Offices (Incl. GF Core)	- 6,900 sq ft (641m ²)
Total Area	- 145,600 sq ft (13,527m²)
Unit 4	
Warehouse Area	- 126,200 sq ft (11,724m ²)
Offices (Incl. GF Core)	- 6,300 sq ft (585m ²)
Total Area	- 132,500 sq ft (12,310m²)
Unit 5	
Warehouse Area	- 278,450 sq ft (25,869m ²)
Offices (Incl. GF Core)	- 13,900 sq ft (1,291m ²)
Transport Office	- 2,500 sq ft (232m ²)
Total Area	- 294,850 sq ft (27,392m²)
Unit 6	
Warehouse Area	- 371,350 sq ft (34,499m ²)
Offices (Incl. GF Core)	- 18,550 sq ft (1,723m ²)
Transport Office	- 2,500 sq ft (232m ²)
Total Area	- 392,400 sq ft (36,455m²)
Unit 7	
Warehouse Area	- 29,300 sq ft (2,722m ²)
Offices (Incl. GF Core)	- 2,900 sq ft (269m ²)
Total Area	- 32,200 sq ft (2,991m²)
Unit 8A	
Total Area (Incl. 15% Offices)	- 12,100 sq ft (1,124m²)
Unit 8B	
Total Area (Incl. 15% Offices)	- 9,400 sq ft (873m²)
Unit 8C	
Total Area (Incl. 15% Offices)	- 11,150 sq ft (1,036m²)
Unit 9	
Warehouse Area	- 56,100 sq ft (5,212m ²)
Offices (Incl. GF Core)	- 5,600 sq ft (520m ²)
Total Area	- 61,700 sq ft (5,732m²)
Total Area	- 1,210,750 sq ft (112,482m²)
Total Site Area	- 113.58 Acres (45.96 Hectares)

	Development Site - 77.76 Acres (31.47 Ha)
	Golf Club - 34.61 Acres (14.00 Ha)
	Montague House - 1.21 Acres (0.49 Ha)
	Total Area - 113.58 Acres (45.96 Ha)

A	Initial Issue	##	##	##	##
rev	amendments	by	cid	date	

**Blythe Bridge, A50,
 Stoke-On-trent**
 Site layout



Newark Beacon Innovation Centre, Capenhurst Way, Newark, Nottinghamshire NG24 2JN
 +44 (0)1636 653027 +44 (0)1636 653010 info@umcarchitects.com

Drawing Status:	Feasibility
Drawn / Checked:	RS / CA
Date:	09/09/2019
Scale:	1:2000 A1
Drawing no:	Revision:
19244 F0001	B

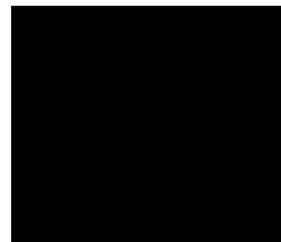


21 April 2020
 Bellway Homes - Response to Stafford LP Issues and Options Consultation April
 2020



Forward Planning
 Civic Centre
 Riverside
 Stafford
 ST16 3AQ

Michael Davies



Sent via email to: forwardplanning@staffordbc.gov.uk

Dear Sir / Madam

**Consultation Response to the Stafford Local Plan Review Issues and Options Consultation
 Land between Main Road and A51, Little Haywood - Bellway Homes**

On behalf of Bellway Homes ('Bellway'), we have prepared the following submission in response to the Local Plan Review Issues and Options Consultation. Bellway is promoting land between Main Road and A51, Little Haywood for residential development and public open space. We have set out the background to the site in the section below and within the submitted Vision Document.

This submission also includes comments on the following questions within the Local Plan Review document:

- Question 1.A
- Question 3.D
- Question 4.A
- Question 4.C
- Question 5.Ab
- Question 5.Ba+b
- Question 5.C
- Question 5.D
- Question 5.Fa+b+c
- Question 5.G
- Question 5.H
- Question 5.I
- Question 5.J
- Question 8.A
- Question 8.B
- Question 8.C
- Question 8.D
- Question 8.E
- Question 8.F
- Question 8.H
- Question 8.I
- Question 8.K
- Question 8.N
- Question 9.A
- Question 9.C
- Question 9.E
- Question 9.F
- Question 9.G
- Question 9.I
- Question 9.J
- Question 9.L
- Question 9.M
- Question 9.N
- Question 10.A
- Question 10.B
- Question 10.C
- Question 12.B
- Question 12.D

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

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Site Context

The submitted Vision Document sets out detailed information on the site context, site opportunity and constraints, a summary of various pieces of technical work that has been undertaken to inform the illustrative masterplan and key potential benefits of the development proposals.

In summary, the site comprises of circa 31ha (77 acres) of land between the two 'Large Settlements' of Little Haywood and Great Haywood (Stafford SHELAA Site ID COL13). The site is bound by Main road to the south, A51 to the north and a mixture of residential dwellings and agricultural fields to the east and west. As shown on pages 6 and 7 of the Vision Document, the site is in close proximity to the range of shops, services and facilities provided in Great Haywood and Little Haywood as well as being within 0.2 miles of bus stops on Main Road which provide a frequent bus service between Stafford, Rugeley and Lichfield City.

We consider that Little Haywood is suitable for housing growth on the basis that it has only delivered minimal growth in the adopted Development Plan. Little Haywood has only delivered 13 dwellings since 2011 and has experienced the lowest growth than any of the other 'Key Service Villages' in the Borough. Little Haywood is proposed to be categorised as a 'Large Settlement' in the Local Plan Review consultation document which we support as it is a sustainable settlement. As a Large Settlement, more residential growth should be directed to Little Haywood than has previously been directed under the adopted Development Plan.

To support the development proposals of our client's site, initial technical work has been undertaken on highways impact and access, heritage, landscape, noise, drainage and ecology. In short, there are no known technical issues that would impact on the site's ability to be able to deliver a residential development. This is also supported in the two appeal decisions on the land to the south of the site where the Inspector concluded that there were no technical issues that would result in the refusal of planning permission (application references 14/20477/OUT and 15/22731/OUT).

Since the appeal decisions were determined, Colwich Neighbourhood Plan has subsequently been made designating four Local Green Space areas across the site. We acknowledge that these areas are considered to be of local importance due to the Public Rights of Way that cut across the site. The proposals submitted seek to re-provide the same level of Local Green Space but redistributed across the landscape whilst providing new development. However, we consider that the proposed development and public green space set out within the Vision Document improved. The proposals seek to improve connectivity and enhanced community spaces. Prior to the production of the attached Vision Document and Proposals we have engaged with Colwich Parish Council to discuss any potential community benefits that could potentially be located on the site and where on the site they should be located. Our initial discussions with the Parish Council have been captured within the Vision Document but we have agreed to keep an ongoing dialogue with the Parish Council throughout the Local Plan Review process.

The Vision Document sets out three potential development options for the site and an alternative option which are summarised below:

- **Option 1** - This option proposes 2.2 ha (5.4 acres) of Residential Development, delivering approximately 70 new homes at 32 dwellings per hectare and 3.2 ha (7.9 acres) of Public Open Space. Vehicular access is proposed to be taken off Main Road.
- **Option 2** - This option proposes 6.7 ha (16.6 acres) of Residential Development delivering approximately 215 new homes at 32 dwellings per hectare and 6.5 ha (16.1 acres) of Public Open Space. Vehicular access is proposed to be taken off Main Road.
- **Option 3** - This option proposes 13.3 ha (32.9 acres) of Residential Development delivering approximately 425 new homes at 32 dwellings per hectare and 14.9 ha (36.8 acres) of enhanced public open space. This option provides an opportunity to deliver a comprehensive solution to Local Green Space improvements. It could enable the delivery of two green corridors moving NE to SW and NW to SE providing enhanced linkages and public open space opportunities for existing and

future residents of both Little Haywood and Great Haywood. Vehicular access is proposed to be taken off Main Road and the A51.

- **Alternative Option** - This option proposes 4.2 ha (10.3 acres) of Residential Development delivering approximately 135 new homes at 32 dwellings per hectare and proposes 3.7 ha (9.1 acres) of enhanced public open space. This option retains the existing Neighbourhood Plan designated Local Green Space in its entirety and proposes access of the A51.

We consider that the site is in a highly sustainable location as it is adjacent to two 'Large Settlements' within the Borough and there are no known technical issues that would impact on the site's ability to deliver housing. Notwithstanding that the site could deliver much needed market and affordable homes for the Borough, the submitted Vision Document sets out additional potential benefits of the scheme which could include public open space (the final amount will depend on the amount of development proposed), improved green infrastructure links and improved pedestrian and cycle connectivity and links between Great Haywood and Little Haywood. We therefore consider that the development of this site would accord with the sustainable development requirements of the National Planning Policy Framework ('NPPF') and should be allocated for residential development within the Local Plan Review document.

Local Plan Review – Issues and Options Consultation Response

Question 1.A Is the evidence that is being gathered a suitable and complete list? And Question 1.B Have any key pieces of evidence necessary for Stafford Borough's new Local Plan been omitted?

We consider that the following evidence documents should also be included in Table 1 and need to be undertaken in order to support the policies within the Local Plan to ensure that the Local Plan accords with Paragraph 31 of the NPPF:

- Landscape Appraisal
- Heritage Assessment
- Infrastructure Delivery Plan
- Settlement Assessments – the July 2018 document should be updated to correctly identify the number of dwellings that have been delivered in the settlements since 2011.
- Viability Assessment
- Urban Capacity Assessment – to assess the potential availability and yield that brownfield sites have in the District. This should allow the Council to be able to identify how many houses can be directed to brownfield sites and where greenfield sites are then required, this document will allow the Council to justify their position.

Question 3.D Should the spatially-based approach to the objectives be retained? Does this spatially-based approach lead to duplication? and 3.E Is the overall number of objectives about right?

We do not consider that all of the objectives listed between pages 28 – 30 support the Council's proposed growth options set out in paragraph 5.36. The Council's preferred Growth Options 3, 5 and 6 all propose that the distribution of development is dispersed across the settlement hierarchy. However, the Key Objectives for areas outside of Stafford and Stone on page 29 state that only small scale housing development is appropriate within existing villages (Objectives 21 and 25). We do not support this approach as it is contrary to; the NPPF that requires a sufficient amount of housing to come forward where it is needed (paragraph 59), the adopted and proposed settlement hierarchy and the growth aims of the new Local Plan.

The proposed 'Large Settlements' outside of Stafford and Stone have all been assessed as sustainable settlements in the Council's Settlement Assessment (July 2018) due to the existing services and facilities they offer as well as their accessibility to public transport. The Large Settlements in the Borough should therefore be expected to contribute more than just 'small scale' housing development.

In light of the above, we request that reference to housing sites in settlements outside of Stone and Stafford being small scale should be removed from Objective 21 and the scale of development suitable in settlements outside of Stafford and Stone should be determined by whether it is adjacent to a 'Large Settlement' or not.

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 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?

We do not consider that development should be required to be built at a greater standard than the statutory Building Regulations as this is considered to be an inflexible approach. Paragraph 150b of the NPPF and the PPG state that Local Planning Authorities can set their own energy performance standards for new housing but they can only be set up to the equivalent of Level 4 of the Code for Sustainable Homes and any requirement will need to be based on robust and credible evidence paying careful attention to viability (PPG Reference ID: 6-009-20150327).

Instead of setting rigid policy requirements, we consider that the policy should be worded to 'encourage' energy efficient homes where it is practical and viable and that the policy should not go beyond the standards set by the Building Regulations.

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

Further clarity is required on the scale of development that would be required to provide on-site renewable energy supply and consideration needs to be given to the specific types of renewable energy methods that the Council are seeking to be provided as they all may not be appropriate on all large development sites.

The PPG supports development plan policies requesting a proportion of energy used in development in their area to be energy from renewable sources but there is no requirement for the sources to be 'on-site' (PPG reference ID: 6-012-20190315). We therefore consider that if the LPA decides to pursue the requirement for on-site renewable energy sources on large developments, further evidence will be required to justify this policy. The policy should be worded to be as flexible as possible as on-site renewable energy sources may not be appropriate on all large developments. Although we do not support it, if the LPA decide to pursue this policy, then it should 'encourage' not require on-site renewable energy sources.

Question 5.A b) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate's view.

Policies which support the presumption in favour of sustainable development are already located throughout the NPPF (2019). Therefore, we consider that Policy SP1 is superfluous and should be removed in accordance with the Planning Inspectorate's recent change in view.

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?

We support the statement made in paragraph 5.9 that the housing requirement figure of 408 dwellings per annum is a minimum figure as this accords with paragraph 60 of the NPPF and the PPG (Reference ID: 2a-002-20190220). In light of this, we agree that Scenarios A, B and C in Table 5.1 should be discounted as they propose to deliver below the minimum 408 dwellings per annum. We also consider that Scenario D which could deliver between 435 – 489 dwellings per annum should also be discounted as a requirement of less than the adopted housing requirement (500 dwellings per annum) should not be pursued as it is contrary to the

Government and Council's pro-housing growth approach. Additionally, the net job growth forecast under Scenario D (5,920) is significantly lower than past trends of job growth so again, it is contrary to the Council's pro-growth approach.

We consider that Scenarios F and G should be discounted as they are based on either past and future trends and are not considered to be suitably justified.

It is considered that the most appropriate and achievable housing need scenario is Scenario E. We support the findings of the HNA that planning for a housing requirement of circa 711 dwellings is a realistic approach as it based on a 'policy-on' approach. The 2019 Housing Delivery Results demonstrate that Stafford Borough should be able to comfortably deliver 711 dwellings because over the last three years the Borough has delivered 1,010 dwellings (2016-17), 863 dwellings (2017-2018) and 699 dwellings (2018-2019) and has surpassed its housing need by 222%. We therefore consider that Scenario E is the most appropriate scenarios and 711 dwellings should be the target housing need.

On a separate note, although we agree with paragraph 5.7 that Stafford is not part of the Greater Birmingham Housing Market Area (GBHMA), it is adjacent to GBHMA with direct public transport links to Birmingham City. South of Stafford was also included within the area of search in the GBHMA's Strategic Growth Study (February 2018). Paragraphs 11b and 65 of the NPPF require local planning authorities to assist neighbouring areas to meet any unmet need and there is no reference in the NPPF that states that neighbouring areas have to be within the same housing market area. Therefore, we consider that as Stafford is adjacent to the GBHMA, has limited Green Belt constraints and has direct transport links to Birmingham, the Council should liaise with the HMA authorities and potentially assist in accommodating some of the GBHMA's housing shortfall. Once an agreement is made between the HMA authorities, as set out in the PPG, an agreed position on housing needs should be set out in a Statement of Common Ground (SoCG) signed by the respective authorities (PPG reference : 61-010-20190315).

Question 5.B b) Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

We support the incorporation of a Partial Catch Up ('PCU') rate allowance when determining the housing need figure. We agree with the rationale for the PCU rate in paragraph 5.8 which states that as Sub National Household Projections (SNHP) draw on past trends, this results in household formation rates continuing to be suppressed, having been suppressed during the last recession. This potential undercounting is particularly pertinent considering that headship rates amongst 15-34 year olds are projected to make up 50% of the difference of long-term trends.

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.

We do not support the Council applying a discount to the Housing Requirement figure for the New Local Plan. Paragraph 31 of the NPPF requires that when reviewing planning policies they should be underpinned by relevant and up-to-date evidence. We consider that any of the existing allocations that have not been developed should be reconsidered and assessed alongside the new sites which have been submitted to the Council through the Call for Site's process. All existing allocations need to demonstrate that they are still deliverable, if they are not and then a discount is applied there will then be a shortfall of dwellings from 2031. We do not consider that applying a discount would be a positive or aspirational approach from the Council and would therefore not be in accordance with the NPPF (paragraph 16).

Question 5.D

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

We support the identification that Great Haywood and Little Haywood should be ‘Large Settlements’ (Tier 4) in the 2019 Settlement Hierarchy. The identification of Great Haywood and Little Haywood as two of the most sustainable settlements in the Borough is supported in the Council’s Settlement Assessment (July 2018) which highlights the range of services and facilities provided across the two settlements as well as the limited physical constraints and the strong bus and road accessibility.

Table 5.13 (as amended by the Addendum published on 24 March 2020) sets out that since 2011 Great Haywood has delivered 318 dwellings and Little Haywood has delivered 13 dwellings which is 30.3% and 1.4% respectively of the increase in the number of dwellings in the settlements since 2011. Little Haywood has experienced the lowest growth than any of the other ‘Key Service Villages’ in the Borough. Furthermore, there are number of settlements that have previously taken more housing growth than Little Haywood which are proposed to be re-categorised as medium settlements in the 2019 Settlement Hierarchy, including Barlaston - 21 dwellings, Haughton - 19 dwellings, Tittensor - 16 dwellings, Weston - 53 dwellings and Woodseaves - 29 dwellings. Additionally the settlement of Seighford has delivered 18 dwellings even through it is not a Key Service Village. As a sustainable and proposed ‘Large Settlement’, we consider that in order to comply with the Council’s own evidence base which identifies Little Haywood as a sustainable settlement and to appropriately balance housing growth across the ‘Large Settlements’, additional housing growth in the Local Plan should be directed to it. When considering Little Haywood, the options for expansion are limited to the north of the village given the barriers provided by the A51 to the east and the Registered Park and Gardens of Shugborough Hall to the west.

The table in Appendix 1 of the Local Plan sets out the potential share of the 408 dwellings per annum for each sub-area. As we stated in our separate response to Question 5.B a), the 408 dwellings figure should be seen as a minimum housing need and therefore the share of the housing for each sub-area in Appendix 1 should also be seen as a minimum. Great Haywood and Little Haywood are included in the table as ‘Colwich’ and out of 408 dwellings per annum, Colwich Parish is expected to provide just 14 dwellings per annum. We do not consider that Colwich Parish’s share of the 408 dwellings per annum reflects that it includes two of the most sustainable settlements in the District. We consider that the Council’s proposed approach of allowing settlements which are considered to be less sustainable than Great Haywood and Little Haywood to deliver more dwellings to be unsound. Fulford is a proposed ‘Medium Settlement’ and it is expected to provide 18 dwellings. Swynnerton and Seighford are both proposed ‘Small Settlements’ yet it is proposed that they will deliver 10 and 6 dwellings respectively each year. Additionally, compared to the other large settlements, Eccleshall and Gnosall are both expected to deliver 15 dwellings per annum each.

The Housing Needs Assessment states that “the current households could be used as a starting point to apportion out what each sub-area’s ‘fair share’ of housing need would be” (paragraph 12.6). We agree that the table at Appendix 1 of the Local Plan table could be used as a starting point but household projections do not take other material considerations into account such as a settlements’ accessibility, shops and services provided and physical constraints. We therefore do not support the Council using this table to distribute housing need across the settlements in the Local Plan Review. Settlements should be considered on their own sustainability merits and the majority of housing growth for the Borough should be directed to and dispersed across Stafford, Stone and the Large Settlements in order to accord with the NPPF which promotes sustainable development.

We note the conclusions of paragraph 5.17 relating to an apparent imbalance between growth experienced in the Key Service villages since 2011. As well as ensuring that the Council has had a 5 Year Housing Land Supply, this also demonstrates that there is a strong demand for housing in these settlements which should be

reflected in housing requirements and distribution against the 2019 Settlement Hierarchy. There should be no restrictions to growth within the Large Settlements as they are sustainable settlements, as demonstrated in the Settlement Assessment document (July 2018) and are able to accommodate further growth.

We do not support the provision of Tier 3 in the 2019 Settlement Hierarchy as we do not consider that there is any justification that the urban areas identified in Table 5.4 of the Local Plan Review will be able to accommodate significant growth. The Council has not produced any evidence which justifies that land to the north of the Borough is more sustainable than the Large Settlements which have been assessed in the Council's Settlement Assessment (July 2018).

Additionally, the north of the Borough is constrained by Green Belt. No suitable, achievable and available sites outside the Green Belt have been identified in the SHELAA in the north of the Borough, so without any deliverable sites we do not consider that the proposed Tier 3 settlements should be categorised above 'Large Settlements' in the proposed settlement hierarchy. Large Settlements which have suitable, available and achievable sites, such as Great Haywood and Little Haywood, should be the preferred location for housing growth over the 'North Staffordshire Urban Areas' which would require the release of Green Belt land. Due to there being suitable deliverable sites outside of the Green Belt, we also do not consider that there are any exceptional circumstances to justify the release of any land from the Green Belt (paragraph 136 of the NPPF) and we therefore agree with paragraph 5.24 of the Local Plan that the Green Belt boundary should not be amended. We proposed that the Large Settlements become 'Tier 3' and the 'North Staffordshire Urban Areas' become 'Tier 4' in the hierarchy.

We agree that the smaller settlements can be identified in the settlement hierarchy. However, only a limited amount of growth should be proposed in medium and small settlements. As set out above, the majority of growth should be directed to Stafford, Stone and Large Settlements as they are the most sustainable settlements in the Borough. Sites adjacent to these development should be considered for development before sites adjacent to any of the settlements in Tiers 3, 5 and 6.

Our client is promoting land adjacent to the 'Large Settlements' of Great Haywood and Little Haywood (Site ID COL13). The SHELAA has assessed the site as available, achievable and suitable as it is adjacent to sustainable settlements. The southern part of our client's land was the subject of two planning appeals (application references 14/20477/OUT and 15/22731/OUT), and although they were refused, no environmental or heritage constraints were cited as being a reason for refusal. Therefore, we strongly support the SHELAA's assessment of the site that it is developable. In support of these representations, we have submitted a Vision Document for the site which demonstrates the key benefits of any future development of the site. We consider that the allocation of our client's land for residential development demonstrates that an appropriate amount of housing growth could be delivered adjacent to the sustainable 'Large Settlement' of Little Haywood during this plan period.

Question 5.F

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

We consider that a combination of "strong settlement / settlement cluster" and "Wheel' settlement cluster" is the most appropriate spatial scenarios within the Borough. These options will ensure that housing growth is directed to the most sustainable settlements and that new development will be able to utilise the services and facilities of adjacent settlements where they are in close proximity. As well as being able to utilise existing services and facilities, new developments could also be able to provide investment in new facilities which existing communities can also gain benefit from.

Our client is promoting land adjacent to the 'Large Settlements' of Little Haywood and Great Haywood. As set out in Figure 5.1 of the Local Plan, development of our client's land for housing will result in housing being

delivered adjacent to an existing high quality transport corridor (A51 and Main Road) and two settlements which offer a range of services and facilities (as set out in the Council's Settlement Assessment July 2018) as well as creating a link between the two settlements and supporting the character of the existing area.

Question 5.G Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements?

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

Please explain your answer.

We consider that there are enough deliverable sites adjacent to existing settlements which can deliver the housing and employment needs of Stafford up to 2040. We therefore do not consider that a new Garden Community of Major Urban Extension is required during this plan period.

Question 5.H

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

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

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

We support preferred Growth Options 3 and 6. However we do not agree that the only NPPF compliant Growth Options proposed are Options 3, 5 and 6 as Option 2 is also an appropriate option.

As set out in our separate response to Question 5.D, we do not support the Council's assertion in paragraph 5.40 that a move away from the Sustainable Settlement Hierarchy is required because it has resulted in a disproportionate amount of growth in the Key Service Villages. Directing growth in this Local Plan Review away from the most sustainable settlements is contrary to the objectives of NPPF (paragraphs 7 and 11). Instead the Council should seek to direct a greater proportion of growth to the Key Service Villages that have not delivered significant growth to date. Little Haywood is proposed to be a 'Large Settlement' in the 2019 Settlement Hierarchy yet it has only delivered 13 new dwellings since 2011. This represents the lowest level of housing growth of any of the Key Service Villages and is even less than settlements which are not identified as Key Service Villages such as Seighford. We therefore consider that once the housing requirement is established, 'Large Settlements' should be the location of a significant amount of the Borough's growth. Given that 'Large Settlements' are identified as one of the most sustainable tiers of the settlement hierarchy and Little Haywood has previously received the lowest level of housing growth, then we consider that this justifies Little Haywood being identified for significant housing growth in the current local plan review.

As well as directing growth to the most sustainable settlements, Option 2 still allows for 8% of housing growth to be distributed amongst the rest of the Borough which we consider is appropriate as it will allow for small rural sites within smaller and less sustainable settlements to be delivered (NPPF paragraph 68).

Although Option 2 does not acknowledge the proposed 'North Staffordshire Urban Area', as set out in our response to Question 5.D, the north of the Borough is constrained by Green Belt. We do not consider there are exceptional circumstances to support the release of any Green Belt land as there are enough suitable, available and achievable non-Green Belt sites to meet the housing needs of the Borough during this plan period. We therefore do not consider that any housing growth should be directed to the north of the Borough.

We are also supportive of Options 3 and 6. Option 3 will result in the disbursement of dwellings across the settlement hierarchy with the majority of growth proposed towards Stafford (50-70%), Stone (10-20%) and the Large Settlements (10-20%) in the Borough. We support the majority of growth being directed to Stafford. However, we consider that more growth should be directed to the six proposed Large Settlements rather than Stone to ensure that the impact on existing services, facilities and infrastructure is distributed. The Large Settlements provide a range of services and facilities and should together be expected to provide more dwellings than Stone. Within the 'Large Settlement' category, Little Haywood should then be the subject of the greatest growth as it has delivered the lowest level of housing growth out of all of the adopted 'Key Service Villages' since 2011.

Under Option 3, the medium and small settlements are expected to deliver between 5-10% of the Borough's housing growth each. As the less sustainable settlements in the Borough, in order to comply with the objective's of the NPPF to promote sustainable development, we consider that medium and small settlements should only be expected to deliver between 5 - 10% of the Council's housing requirement to meet rural housing needs. The remaining 5-10% not delivered under these settlements can then be delivered in more sustainable and appropriate locations adjacent to Large Settlements.

We support acknowledgement of key constraints in paragraph 5.49. As mentioned above, we do not consider that exceptional circumstances exist to justify the removal of any land out of the Green Belt during this plan period as there are considered to be enough deliverable non-Green Belt sites adjacent to sustainable settlements.

We also support Growth Option 6 which seeks to concentrate development within existing transport corridors / clusters of communities although we seek confirmation from the Council at the level of development they propose to potentially deliver along the transport corridors. One of the corridors being considered in paragraph 5.59 is the 'Stone – Weston – Hixon – Great Haywood – Little Haywood (A51)'. We support the inclusion of this transport corridor and consider that sites which are adjacent to the A51 and settlements along the corridor, such as our client's site, should be considered as potentially suitable locations for housing development.

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.

As set out in our separate response to Question 5.G, we do not consider that a new settlement is required to meet the housing needs of the Borough. The SHELAA identifies a sufficient variety of available, achievable and suitable sites that could be delivered adjacent to existing sustainable settlements.

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?

Taking our separate responses to Question 5 into account we consider the following:

1. Growth Option Scenario E
2. Partial Catch Up to be applied
3. A discount should not be applied.
4. A garden community is not required during this plan period.

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

We agree that the Council should continue to encourage the development of brownfield land over greenfield land in accordance with the NPPF (paragraph 117) subject to environmental, heritage, accessibility and viability considerations. Additionally, like most local planning authority areas, there are considered to be limited brownfield site development opportunities and therefore the Council should also be encouraging greenfield land opportunities where they are adjacent to existing sustainable settlements, not within the Green Belt, well served by public transport and have limited environmental and heritage constraints.

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

If so do you consider:

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

Why do you think this?

The NPPF encourages planning policies to make efficient use of land (Paragraph 122) but the NPPF only states that minimum densities should be sought where there is a shortage of housing land (paragraph 123). There is not a shortage of housing land in Stafford, however we consider that proposing potential density thresholds reflective of the character of a local area could be of benefit to applicants as it could provide some additional guidance on the density that applicants should be achieving in that area. A blanket density should not be applied as it does not provide any flexibility for applicants nor does it reflect the varying characters of the different settlements across the Borough.

If the Council do pursue providing a range of density thresholds in the Local Plan Review it is still important that proposed densities for sites are assessed on a site by site basis and agreed with the applicant through the pre-application / determination process.

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

As set out in our response to Question 8.D, we consider that densities should be determined on a site by site basis. As supported in the NPPF, we consider that the proposed range of density thresholds across the Borough should take account of whether the sites are in the settlements of Stafford or Stone, previously development land or whether they are close to key transport locations (paragraph 123). In light of this, it may be appropriate for sites that are in close proximity to Stafford and Stone Railway stations to be developed at a higher density than sites elsewhere in the District. However, as set out in our response to Question 8.D, density should be considered on a site by site basis and considered in more detail at the pre-application stage between the applicant and Council.

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?

And

Question 8.E In the New Local Plan should the Council

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

Please explain your answer.

We do not consider that the Nationally Described Space Standards are required to be adopted by the Borough. In order to ensure flexibility for developers, floorspace should be considered on a site by site basis and the applicant should be able to demonstrate why they have pursued a particular floorspace for their development. We therefore consider that the Council should pursue Option C.

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

We support the Council's more flexible approach at providing an indicative housing mix range rather than specific percentages. However, the final housing mix should be determined on a site by site basis to ensure that there is enough flexibility for the developer and that the location of the site can be taken into account. For example, for sites within the centre of a settlement, it may be more appropriate for a greater number of 1 and 2 bedroom properties than 4+ bedroom properties to be provided as sites in the centre of a town are potentially less attractive to families who require larger properties.

Question 8.H

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

We currently do not support the proposed requirement for 10% of affordable homes delivered to be wheelchair accessible as the Council has not set out an evidence base, including research, technical assessments or a review of development viability impacts to justify this policy. Any standard that is in excess of Building Regulations should not be sought or applied in a blanket fashion unless there is an evidence base supporting such an approach is made available. As set out in paragraph 35 of the NPPF a policy requirement must be supported by proportionate evidence and as presented we do not consider that this proposed policy requirement currently is.

Question 8.I

- a) **Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development?**
- b) **Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens?**
- c) **Is there a need for bungalows to be delivered in both urban and rural areas?**
- d) **Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?**

We do not support the Council introducing a requirement for bungalows to be delivered on all major developments. Although we support the Council's ambition to provide more housing to meet the needs of the Borough's aging population, there is no evidence to support the provision of bungalows on major sites. Additionally, the NPPF requires the Council to support development that makes efficient use of land (paragraph 122). Bungalows do not make the most efficient use of land and are therefore contrary to the NPPF.

It is considered that other forms of accommodation are just as suitable, if not more suitable, to meet the needs of the aging population such as maisonettes and apartments with lifts which will ensure that developments in the Borough will still make efficient use of land.

Question 8.K

- a) **Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable?**
- b) **In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient?**

As the housing need of the Borough has not been set, it is difficult to comment on whether the proposed affordable housing provision of between 252 dwellings and 389 dwellings is appropriate. The PPG states that the total affordable housing need should be considered in the context of its likely delivery as a proportion of a mixed market taking into account the percentage of affordable housing to be delivered by market housing-led developments (PPG reference ID: 2a-024-20190220). At the stage where the affordable housing requirement is determined, the Council should ensure that it is supported by evidence and will not have a negative impact on the viability of housing sites in the Borough.

Question 8.N

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

a) We object to all new developments of over 100 dwellings being required to provide 5% of plots for self and custom build homes. Instead, we consider that specific sites should be allocated for self-build provision. On a major development there is a risk that the provision of self-build plots could slow down the delivery of housing due to the administrative consequences of agreeing contracts and releasing the land etc. In addition there are also practical issues to consider, for example the day to day operation of such sites and consideration of potential health and safety issues of having potentially 5% of the site as individual construction sites within one development. The provision of self-build plots represents an onerous obstacle on the delivery of strategic housing sites. The provision of such plots should be left to the discretion of the developer based on market trends, which are liable to change over the plan period.

b) As set out above, we support the allocation of specific plots for self-build provision throughout the borough.

Question 9.A

Should the Council:

- a) **Have a separate policy that addresses Green and Blue Infrastructure?**
- b) **Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?**

In regards to b), we consider that the potential green infrastructure opportunities that could be delivered as part of development sites should be considered on a site by site basis. We agree that development could play an important role in connecting green infrastructure across the Borough but these should be explored and agreed at the planning application stage and the Council should ensure that green infrastructure provision is directed to the part of the development site which are less suitable for built development to ensure that the development makes the most efficient use of land.

Question 9.C Should the new Local Plan:

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

We agree that the Borough’s designated sites should be protected. However, it is important to recognise the potential opportunities that development can bring to enhance these assets further. This particularly relates to the Cannock Chase SAC where new residential development within 8km of the SAC is expected to provide a financial contribution to reduce the development’s recreational impact on the SAC. Any development within 8km of the SAC which propose significant open space that new residents could use in lieu of travelling to Cannock Chase SAC should be supported by the Council as it should decrease the recreational impact on the SAC.

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

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

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

- a) *ensuring that the existing tree stock within the Borough will be offered adequate protection from removal or damage* – existing tree stock should only be offered protection where the trees are within Ancient Woodland, TPO designated, veteran trees, Category A or Category B trees in accordance with paragraph 175 of the NPPF. Trees not within these categories should not be protected.
- b) *ensuring that any development which provides an opportunity to increase tree cover on site will do so* – in general we support the requirement to plant trees on a site however this should be determined on a site by site basis and tree planting should only be required on appropriate sites.

- c) *developing and later adopting a tree strategy which will see any and all development contribute to a scheme which will increase the tree cover across the Borough as a whole – the Council will need to provide evidence to support this proposal and a proposed formula on how contributions will be calculated will also be required. Sites that can provide tree planting within their own site should not be required to provide contributions for tree planting elsewhere and the viability of sites should be taken into consideration.*

Question 9.F

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

Please explain your answer.

If yes, are the following measures appropriate?

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

In order to be able to support the Council's proposal to require new developments to take an active role in securing new food growing spaces, to accord with paragraph 35 of the NPPF, the Council will need to prepare a sufficient evidence base to support this requirement and demonstrate that there is a need for it. We do not agree with point c) that there should be a blanket requirement for "major residential developments to incorporate edible planting and growing spaces" as it is an inflexible approach and may not be appropriate on all major residential sites e.g. the soils may not support edible plant provision or there may already be sufficient provision in the area. Additionally, more clarity is sought on the types and scale of edible planting that will be required.

Question 9.G Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting? And Question 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.

We do not consider that a specific policy requiring development to minimise and mitigate the visual impact it has on the character areas and landscape setting is required. Major developments are already required to assess their impact on the landscape through the Council's Planning Validation Criteria (August 2019) which we consider is sufficient. Unless the Council's landscape evidence base shows there to be particular sensitivities that require review at the plan making stage, we consider that detailed landscape issues should be left for detailed assessment upon submission of a planning application.

The Council has not produced any evidence to support the proposed designation of a Special Landscape Area. Therefore, we do not support this proposal. If the Council choose to pursue this designation then in accordance with paragraph 31 of the NPPF, they should provide sufficient evidence to justify it.

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 have set out our response to each of the above points below.

1. Any broad definition applied must be supported by evidence based in accordance with paragraph 35 of the NPPF. The Council should be careful not to discount the protection of designated heritage assets over the protection of historic environments at a more broad landscape scale.
2. Undesignated heritage assets have equal standing as designated heritage assets according to the NPPF (paragraph 197). It should be made clear within any future policy that consideration of settlement morphology, landscape and sight lines is not applicable to every development proposal.
3. Consideration of historic context in respect of proposals is understandable. It is however questionable if transport junctions and town centre regeneration need special mention in an historical context.
4. Imaginative incorporation of heritage assets into development is supported. But in some circumstances this may not be appropriate considering the value of the heritage asset and viability of the development.
5. We broadly agree with the sentiment presented, but suggest that a further criterion is added to deem when this is appropriate.

Question 9.J

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

SPDs are required to build upon and provide more detailed advice on specific policies within a Local Plan (PPG reference ID: 61-008-20190315). In light of this, although we have no specific comments on the adopted Design SPD, once the Local Plan Review is adopted, this SPD should be reviewed, amended and consulted on to ensure that it accords with the adopted policy and the national design guidance.

Question 9.L

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

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

Below, we have set out our response to the above questions:

- a) Design is subjective so there should be the opportunity for the applicant to justify their rationale for the design approach to be taken. We also consider that for the majority of major schemes, significant dialogue will have been undertaken to agree the key design principles during the pre-application process. Therefore, these discussions should be taken into consideration too. If a Local Design Review Panel approach is pursued, the Council should ensure that it follows the guidance set out in the PPG (Reference ID: 26-017-20191001).
- b) The adoption of nationally prescribed standards may assist in the design review process. However, the Council should ensure that there is enough flexibility to enable applicants to justify any deviation away from these standards if required.
- c) We support this proposal. However it should also be considered where local characterisation studies are taking place, that they are undertaken at a scale which takes adequate consideration of the site specific characteristics.

Question 9.M Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?

We support the provision of Local Green Space ('LGS') areas across the Borough and we recognise their importance to the local community. However, we consider that where existing LGS are allocated, this should not impact on a site's potential to be developed as long as the equivalent or greater LGS provision is provided as part of the development of the site and it also meets the tests of paragraph 100 of the NPPF.

As set out in the submitted Vision Document, our client is promoting circa 31 hectares of land for residential development between Little Haywood and Great Haywood. Within the 'made' Colwich Neighbourhood Plan (2016), approximately 11ha of the site is designated as LGS in separated parcels. We were unable to identify the evidence used to support the LGS designations as part of the Neighbourhood Plan process but we understand that the LGS are links to the public footpaths that bisect part of the site. In the submitted Vision Document, we have proposed to remodel the LGS areas as part of circa 15ha of connected public open space across the site. Our client's proposal will improve the connectivity of the open space through green corridors and will result in it being more useable. The revised public open space / LGS will be in reasonably close proximity to the community it serves and will ensure that the local community can still access the land through the Public Rights of Ways and enjoy the connected areas of space in accordance with paragraph 100 of the NPPF.

The Council should enter discussions with the landowners of any sites that the Council propose to designate as LGS and all proposed LGS sites need to be supported by evidence which demonstrates how they meet the requirements of paragraph 100 of the NPPF.

Question 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?

In regards to parts h) and j), we do not consider that a blanket requirement should be placed on developments that are over 100 dwellings to provide features that encourage an active lifestyle and cycling and walking infrastructure connections. Requirements such as these should be assessed against existing local provision and an identified local need and determined on a site by site basis and agreed with applicant during the pre-application period.

Question 10.A The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the council;

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

Below we provide comment on points a) and b). For both points, we seek clarity on what the Council define "major development" as.

a) We consider that more information is required on the types of infrastructure that the Council request to be installed and its associated cost. Some electric charging facilities require significant power in order to run them so before any infrastructure is proposed by the Council, the relevant utilities company will need to confirm that there is a known ability to be able to power it.

b) We support the Council's ambition for all major development to be accessible by regular public transport. However, we seek clarification as to what the Council define "regular public transport" to be. Consideration should also be given to the potential improvements to the frequency and type of public transport available if the site was development. Therefore, just because a site may not currently be served by a mode of public transport, there is the opportunity that the development of it will improve its sustainability as well as the sustainability of the area around it.

Question 10.B The currently adopted Plan for Stafford Borough does not enforce any policy to mitigate for the impacts of NO2 particles on internationally designated sites. Therefore should the council enforce a scheme whereby any development likely to result in an increase of NO2 deposition on these sites in Stafford Borough must contribute to a mitigation programme?

We consider that providing a mitigation programme could be a potential solution to ensure that the impact of development on designated sites is mitigated against. However, any mitigation programme proposed by Stafford will need to be sufficiently supported by evidence and any contribution proposed will need to be tested to ensure that the viability of sites are not negatively affected. The Council should work with the landowners of all sites that are proposed to be allocated within the Local Plan Review document that may need to contribute towards this programme to ensure that the Council will be able to demonstrate the programme's deliverability to the Inspector at Examination.

In regards to the Cannock Chase SAC, as there are other authorities that are adjacent to it, it may be of benefit for all of the authorities to work together to agree a joint mitigation programme. This will also ensure that developments within Stafford are not funding programmes that developments in other authority areas will benefit from but not contribute towards.

Question 10.C The currently adopted Plan for Stafford Borough makes reference to waste management in Policy N2. However, the growing population of Stafford Borough and the need for further action to combat climate change suggests the employment of further, more stringent measures encouraging sustainable waste disposal is desirable.

Therefore, should the council;

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

In regards to point a), before we can provide a view on this matter, further clarity is required on what infrastructure the Council propose for major developments to provide.

Question 12.B

- a) **Do you agree with the approach to widening the choice of transport solutions through large scale development in key locations across Stafford Borough, related to the existing network? If not please provide a reason for your response.**
- b) **How do you consider that high quality walking and cycling networks can be developed through new development?**

The below answer contains our response to the points raised in a) and b) of question 12.B:

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

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

Question 12.D

- a) Do you consider it is necessary to set local parking standards for residential and non-residential development ?
- b) If so should a similar approach of minimum standards be used for new developments across Stafford Borough or should maximum parking standards be identified for Stafford town centre area?

Please provide a reason for your response.

We do not object to the Council producing local parking standards to set guidelines on what the highways authority will expect to be provided on a development site. However, parking provision should still be determined on a site by site basis and the applicant should be allowed to justify the level of parking provision they have proposed. For example, sites within a settlement centre may not need to provide significant levels of parking provision as residents will be more likely to walk, cycle or take public transport rather than drive.

We trust the above is helpful and if you have any queries please contact myself or my colleague, Jessica Graham [REDACTED]

Yours sincerely

[REDACTED]

Michael Davies
Director

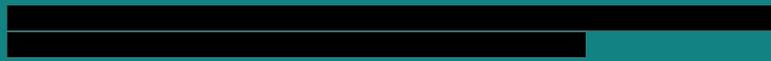


HAYWOOD VALE
STAFFORDSHIRE

VISION DOCUMENT

April 2020

1. Introduction	4
2. Site Context	6
3. Planning Policy Context	8
4. Opportunities & Constraints	12
5. Development Proposals	18
6. Connectivity	26
7. Green Corridors	28
8. Delivering a Well Designed Place	30
9. Benefits Summary & Deliverability	32



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Illustrative view of multi-use green corridors providing local facilities and amenity.

THE VISION

The Site presents an excellent opportunity to deliver new green infrastructure, enhance connectivity and accessibility and provide high quality new homes on 31.1 hectares (76.9 acres) of land as part of an inclusive and sustainable extension to the local community. The vision for the Site is for a landscape-led approach with large, usable green corridors around which residential development, using existing site features, will be accommodated whilst complementing the surrounding site context to create a sustainable new development.

To support the vision for the Site, this Vision Statement clearly articulates the opportunities presented by the Site. In summary, it demonstrates that:



The Site presents an excellent opportunity to enhance existing open green space on the Site, creating large new usable green corridors which enhance connectivity between Great Haywood and Little Haywood for pedestrians and cyclists whilst also retaining a green buffer between the two. This will make existing facilities more accessible for the local community.



We have carefully considered the existing Local Green Space designations and produced alternative enhanced green space areas to improve provision and access for local residents, whilst retaining and enhancing existing landscape features where possible.



Retaining and enhancing the network of pedestrian and cycle routes through public open space and sustainable transport links will increase accessibility allowing for more sustainable movement for the new and existing communities into the Site and the wider area, including nearby facilities.



Delivery of a range and mix of dwellings that will make a positive contribution to the district's housing requirement; providing both open market and affordable housing, and generating significant social and economic benefits for the local area.



The Site is deliverable, achievable and available for housing development in accordance with the guidance contained in the NPPF. There are no known technical or environmental constraints that would prevent the Site coming forward for development.

1. INTRODUCTION

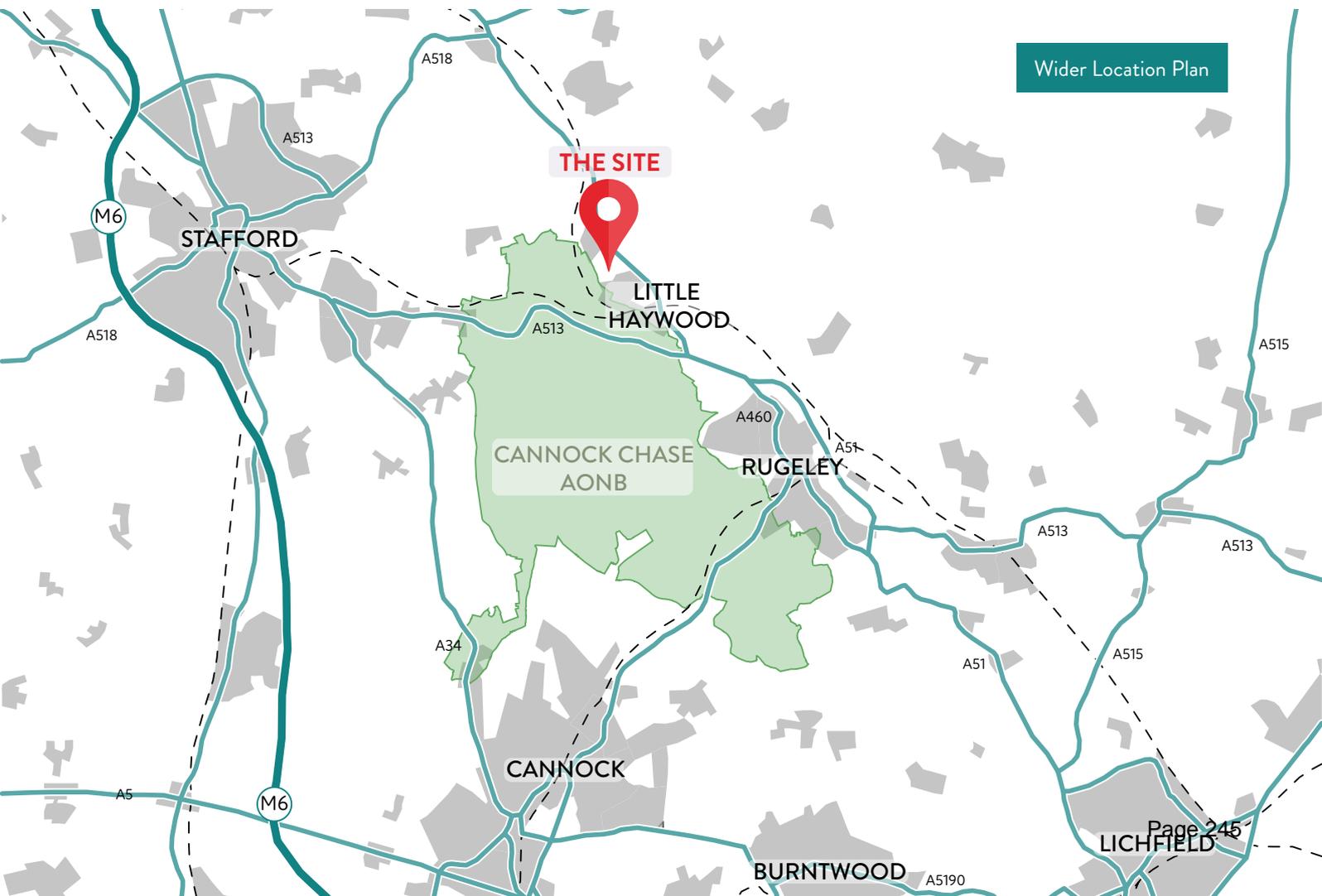
The Site provides an opportunity to create a high quality sustainable residential extension, located between the villages of Little Haywood and Great Haywood, Staffordshire which can deliver much needed family and affordable homes as well as enhanced public open space for the benefit of both new and existing communities.

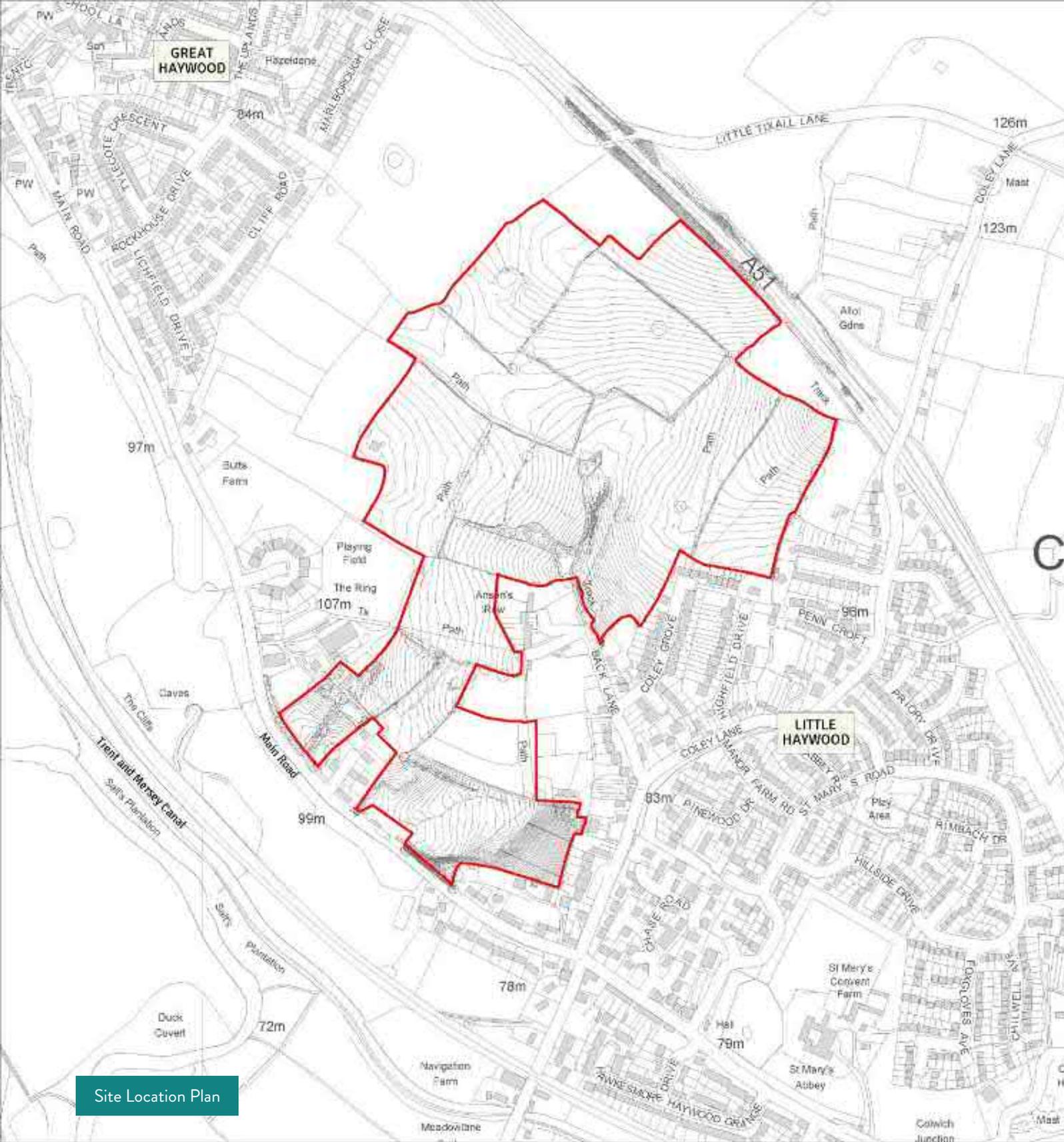
The Site consists of approximately 31.1 hectares of land located north west of Little Haywood. The Site is not within the Green Belt.

The Site is located between Great Haywood and Little Haywood, approximately half a mile north of Cannock Chase AONB and 5 miles west of Stafford.

The Site is accessed from Main Road to the south and bounded as follows:

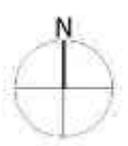
- To the south and south east the Site is bounded by Main Road and residential development. Beyond it to the south are agricultural fields, the Trent Valley Railway, River Trent and Cannock Chase AONB.
- To the north the Site is bounded by the A51 with agricultural fields beyond.
- To the east the Site is bounded by the village of Little Haywood.
- To the north west of the Site are agricultural fields, separating the Site from Great Haywood which lies beyond.





Site Location Plan

— Site Boundary



2. SITE CONTEXT

The Site is located on the north west edge of the village of Little Haywood and to the south east of Great Haywood. The Site is within walking distance of shops and services in both Little Haywood and Great Haywood villages, although existing connectivity between the two is poor.

ACCESS AND MOVEMENT

The Site is accessed from Main Road which runs from Colwich to the south east, through Little Haywood and up to Great Haywood to the north. Main Road is a single carriageway road with a pavement along the opposite side of the road to the Site.

There are a number of Public Rights of Way (PRoW) running through the Site which offer pedestrian connections to the surrounding area including Little Haywood, Great Haywood and the surrounding countryside. Existing pedestrian and cycle connections between the two villages is limited with only a single PRoW with a poorly defined path running between them directly.

Current access to the fields which make up the Site is restricted to the alignment of the public footpaths, with

no formal or informal open space or recreational activities available and the condition of many of the footpaths is poor (wet and boggy under foot).

The Site is also located within walking distance of bus services on Main Road.

PUBLIC TRANSPORT

The closest bus stops to the Site are located:

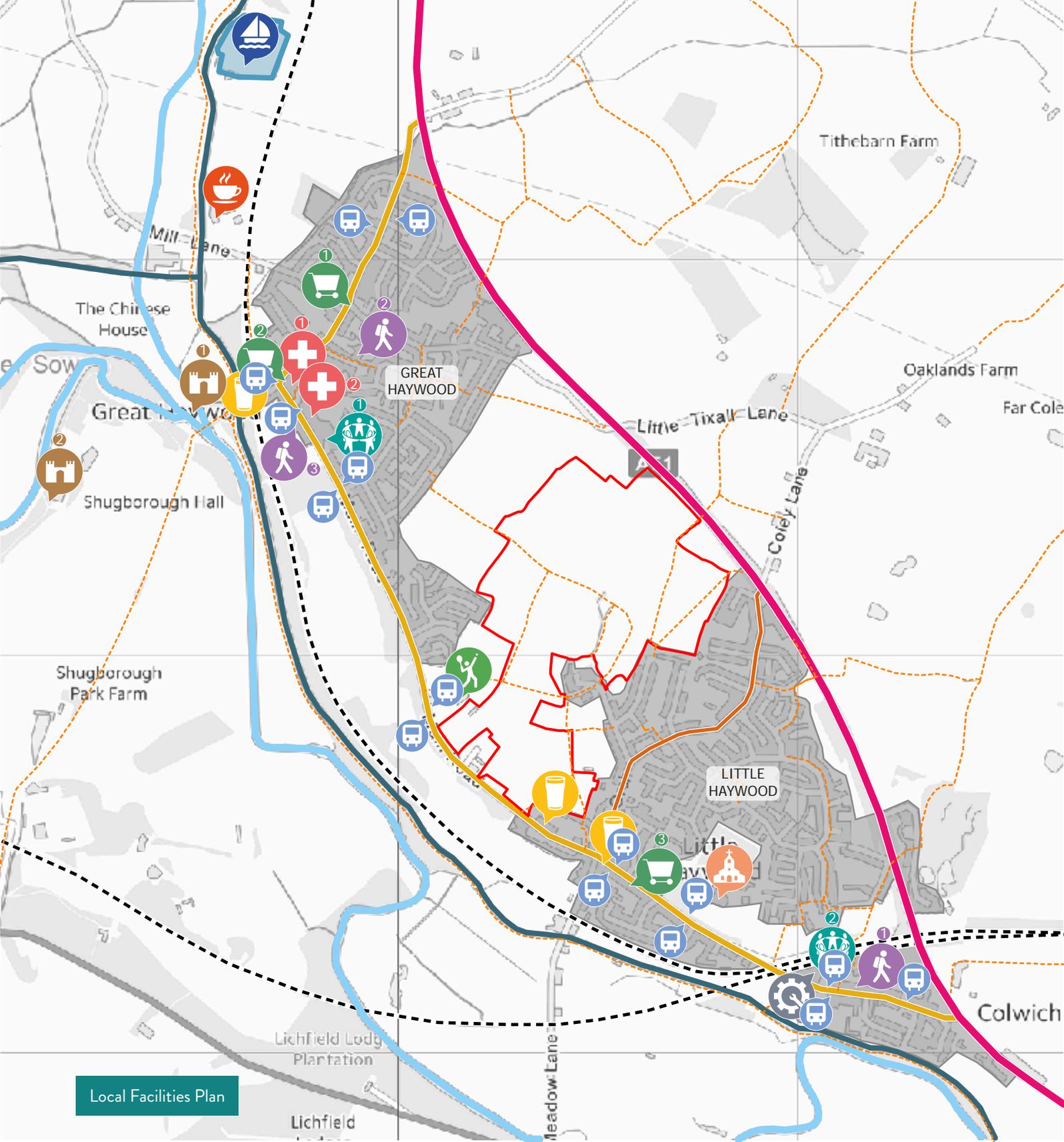
- On Main Road, approximately 0.2 miles, a 3 minute walk south of the Site is served by the 11S, 550, 825 and 828 routes.

The 825 is the main bus route and runs between Lichfield and Stafford via Rugeley with a daytime frequency of approximately every half an hour.

The closest railway stations to the Site are Rugeley Trent Valley and Rugeley Town and can be reached by a 9 minute and 11 minute drive respectively. Both stations offer regular services to London Euston via Nottingham, Crewe and Birmingham International via Birmingham New Street.

LOCAL FACILITIES AND SERVICES

Type	Description	Walking Distance	Walk / Cycle Time
Education	St. John's RC Primary School	1.4 km / 0.9 miles	17 minutes / 4 minutes
	Colwich Primary School	1.0 km / 0.6 miles	10 minutes / 3 minutes
	Anson CofE Primary School	1.1 km / 0.7 miles	12 minutes / 3 minutes
Healthcare	Catshill Village Surgery	1.1 km / 0.7 miles	12 minutes / 3 minutes
	Catshill Clinic	1.1 km / 0.7 miles	12 minutes / 3 minutes
Food Retail	SPAR and Post Office	1.4 km / 0.9 miles	17 minutes / 4 minutes
Pubs, Cafes, Restaurants and Leisure	The Red Lion	0.5 km / 0.3 miles	6 minutes / 1 minute
	The Lamb and Flag	0.6 km / 0.4 miles	7 minutes / 1 minute
	Clifford Arms	1.0 km / 0.6 miles	10 minutes / 3 minutes
	Great Haywood Sports & Social Club	0.8 km / 0.5 miles	8 minutes / 2 minutes
	Colwich and Little Haywood Village Hall	1.3 km / 0.8 miles	15 minutes / 4 minutes
	Canalside Shop and Cafe		



Local Facilities Plan

-  Site Boundary
-  Urban Areas
-  Public Rights of Way
-  A51
-  Main Road
-  Coley Lane
-  Railway Lines
-  Rivers
-  Trent and Mersey Canal

-  Schools
 1. St Johns RC Primary School
 2. Colwich Primary School
 3. Anson Primary
-  Public Houses
-  Medical Centres / Pharmacies
 1. Alphega Pharmacy
 2. Hazeldene House Surgery
-  Great Haywood Marina

-  Shops
 1. SPAR - Great Haywood
 2. Your Local Day-Today Shop
 3. Little Haywood General Store
-  Historic Sites
 1. Essex Bridge
 2. Shugborough Hall
-  Community Halls
 1. Great Haywood Memorial Hall
 2. Colwich and Little Haywood Village Hall
-  St Mary's Abbey, Colwich

-  Station Garage
-  Skate Park and Multi-use Games Area
-  Bus Stops
-  Canalside Farm Shop and Cafe

3. PLANNING POLICY CONTEXT

ADOPTED DEVELOPMENT PLAN

The adopted development framework for Stafford Borough Council comprises the Local Plan Part 1 (June 2014) (LP1) and the Local Plan Part 2 (January 2017) (LP2). The Site is also located within the made Colwich Neighbourhood Plan (NP) area (November 2016).

The Site is not allocated for any land uses but there are areas of 'Local Green Space' within the Site (NP Policy LGS4) and there is a Staffordshire Historic Environment Record (HER number 20096 - Ridge and Furrow, Colwich) in the northern part of the Site. The Site is adjacent to the settlement boundaries of Great Haywood and Little Haywood and the 'Great Haywood & Shugborough' and 'Colwich & Little Haywood' Conservation Areas. The Site is outside of the Green Belt and Cannock Area of Outstanding Natural Beauty.

EMERGING DEVELOPMENT PLAN

The Council is now producing a new Local Plan which will cover the period between 2020-2040.

The Site was submitted to the Council during the Call for Sites process in autumn 2019. The Council is now consulting on the Issues and Options version of the new Local Plan (January – April 2020). This document sets out the potential housing requirement and growth options for the Borough and it also proposes a revised settlement hierarchy. In the LP1 and LP2, Great Haywood and Little Haywood are identified as 'Key Service Villages', in the new Local Plan they are identified as 'Large Settlements'. The settlements continued to be identified as a couple of the most sustainable settlements in the Borough.

Little Haywood has been identified by the Council as having taken the lowest amount of growth (1.2%) of any of the Key Service Villages since 2011. As one of the most sustainable locations in the district we consider that there is scope for further housing growth to be considered at Little Haywood.

When considering Little Haywood, the options for expansion are limited to the north of the village given the barriers provided by the A51 to the east and the Registered Park and Gardens of Shugborough Hall to the west.

The timescales for the production of the new Local Plan are as follows:

- Issues and Options (closes 21st April 2020)
- Preferred Option (January 2021)
- Publication (June 2021)
- Submission (December 2021)
- Examination (March 2022)
- Adoption (October 2022)

STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

The southern part of the Site has been assessed in the SHLAA separately (Site ID COL10) as well as being assessed as part of the whole Site (Site ID COL13).

COL10 has been assessed as being available and achievable and has scored amber for suitability due to the Site being adjacent to the existing settlement boundaries of Great Haywood and Little Haywood. The key constraints identified within the Site are Tree Preservation Orders, Public Right of Way and Local Green Space designations. The Site abuts two conservation areas, a site of biological importance, area of outstanding natural beauty, a Historic Environment Record to the east and south and a Historic Environment Record abuts the northern boundary.

COL13 has also been assessed as available and achievable and has scored amber for suitability due to the Site being adjacent to existing settlement boundaries. The same suitability constraints as COL10 are identified for COL13.

However, the SHLAA also states that “the portion of the site not designated as Local Green Space in the Colwich Neighbourhood Plan is potentially developable based on the compliance with Criteria C5 of the Local Plan and Paragraph 71 of the NPPF”.

In regards to the technical constraints identified on the sites COL10 was previously the subject of two planning appeals and the Inspector’s did not identify any technical constraints which would result in the Site not being suitable for residential development. Therefore, we consider that the technical constraints can be overcome through the design of the Site. In regards to the Local Green Space designations, this has been considered further in the technical chapter of this document and have been taken into consideration when producing design responses for the Site.

COLWICH NEIGHBOURHOOD PLAN - LOCAL GREEN SPACES

Policy CE2 within the NP designates 9 Local Green Space sites, 4 of which are located within the Site (LGS4, LGS5, LGS6 and LGS8). The supporting text states that Local Green Space designations are a way to provide special protection against development for green areas of particular importance to local communities. The NP provides the following justification for why the Local Green Space areas within the Site are important to the community:

- LGS4 – there are public footpaths within the Site which offer views towards Cannock Chase. The NP also states that the Site is ‘rich in wild meadow species’ and there are a number of trees within TPOs.
- LGS5 – there is a public footpath running along the southern boundary which offers views of Great Haywood and Little Haywood as well as Cannock Chase. There are also trees protected by TPOs and a dew pond.

- LGS6 – the fields are considered to have historic significance to an adjacent Grade II Listed house and there are two public footpaths that cross the Site. The Site is part of a network of hedgerows and shrubs which are considered to be of importance by the local community for birds. The Parish Council would like to extend access for recreational purposes through the creation of a footpath linking this area to the rest of the footpath network.
- LGS8 – this site forms part of a medieval field system and has remnants of strip cultivation. There are two public footpaths that cross the Site which provide a link between Little Haywood and Great Haywood.

The NP considers that LGS8 and LGS4 are integral in maintaining the landscape setting and the historic character of this part of the Little Haywood conservation area.

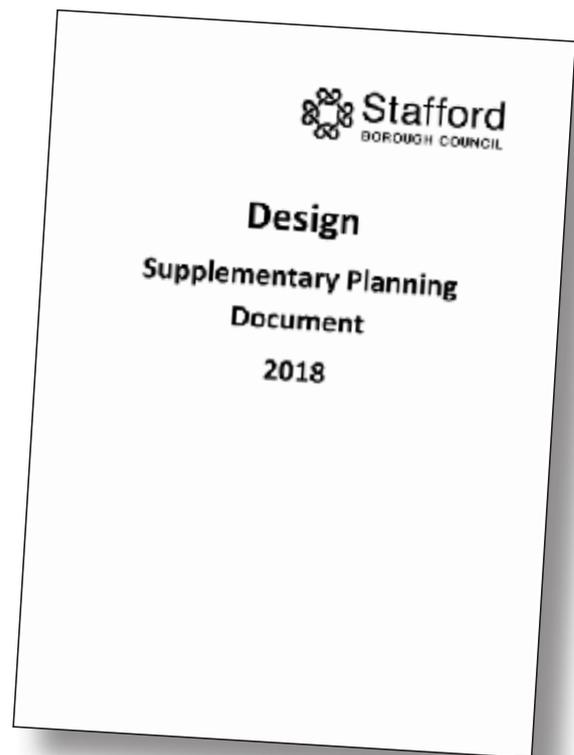
DESIGN GUIDANCE

Supplementary Planning Documents (SPDs) including Design Guidance at local authority level are also considered material in the planning process whilst national level design guidance is also important in informing the design response to the Site.

These documents from Stafford Borough Council and National Government have formed a key part of the design considerations throughout the development of the site proposals.

DESIGN SPD

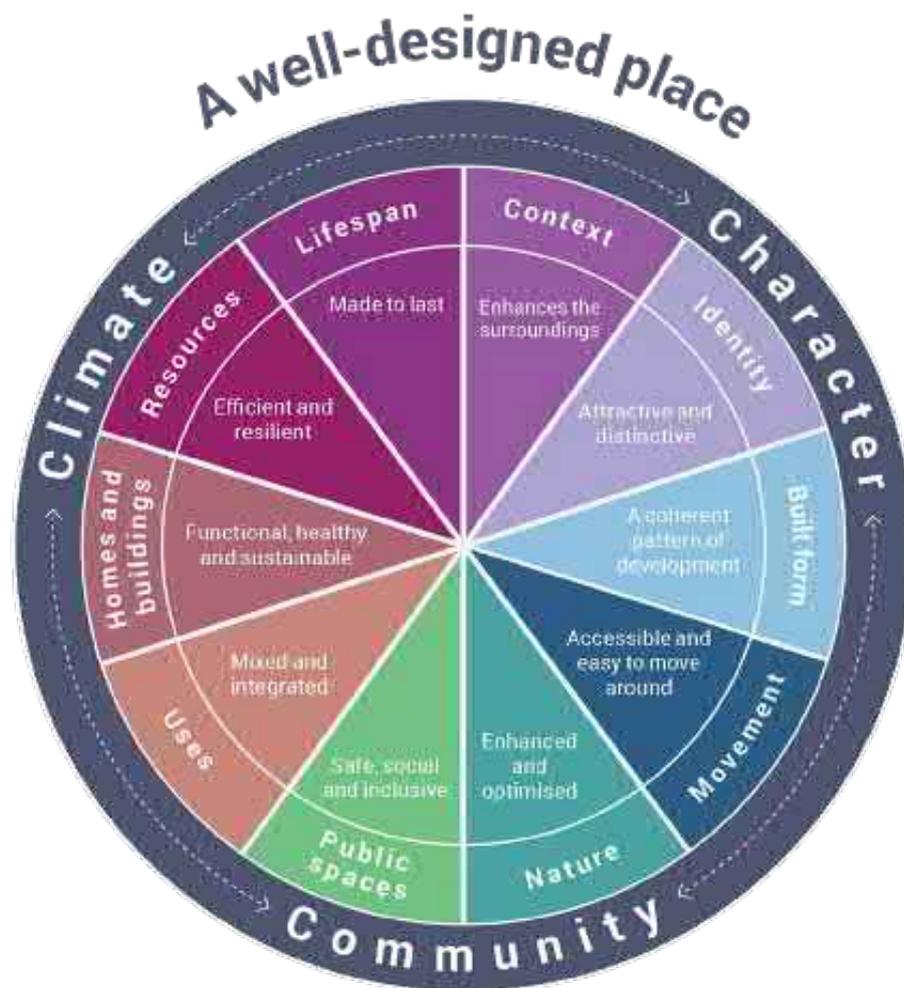
Stafford Borough Council's Design (2018) SPD contains extensive advice relating to sustainable development, layout, density, connectivity, amenity provision and objectives of urban design. The SPD also gives specific guidance on the size and layout of private amenity spaces.



Stafford Council Design SPD

NATIONAL DESIGN GUIDE

On a national level, the recently released National Design Guide (MHCLG, 2019) will be used to guide and develop the design approach. In particular, the ten key principles of good design have been used as a framework to shape the best practice design principles within this document. The contextually driven responsive approach will ensure a high design quality in the resultant development.



Key Design Principles, National Design Guide (MHCLG, 2019)

4. OPPORTUNITIES & CONSTRAINTS

The adjacent plan sets out the key opportunities and constraints identified for the Site and a summary is set out below:

OPPORTUNITIES

- There is an opportunity to reshape existing Local Green Spaces to provide additional connectivity along enhanced green corridors, new community amenities and better access to facilities in Great Haywood and Little Haywood.
- There is an opportunity to create a new usable green corridor along the north-western site edge, providing more open space for the local people whilst acting as a buffer to prevent coalescence with Great Haywood.
- There is an opportunity to create a new east-west green corridor across the Site to link the two settlements for pedestrians and cyclists, increasing accessibility to local facilities and services as well as the new proposed green spaces.
- The Site has an established network of landscape, hedgerow, trees, wildlife corridors and green spaces which the development proposal will be able to utilise and respond to.
- The Site is well located for pedestrian and cycle accessibility to local services and facilities in nearby Little Haywood and Great Haywood.
- There are a wide number of connections into the wider landscape and surroundings existing on the Site in the form of Public Rights of Way which will be maintained and enhanced as part of the development.
- The Site is located entirely within EA Flood Zone 1 and therefore is not liable to flooding. Any surface water flooding will be mitigated with an appropriate attenuation and SUDS strategy.
- The Site is sloping with the topography able to be utilised to inform the location of attenuation ponds.
- The Site is within one land ownership without any known constraints to delivery.

CONSTRAINTS

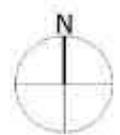
- There a number of designated local green spaces which will need to be considered and either retained or compensated for as part of the proposals. At present there are approximately 11ha of designated Local Green Space on the Site.
- The Site is located in relatively close proximity to Great Haywood and care will need to be taken at the design stage to avoid coalescence and maintain a buffer between Great Haywood and Little Haywood.
- The Site is sloping with gradient restricting development in places.
- Consideration should be given to the registered park and garden and area of outstanding natural beauty to the south.



Opportunities and Constraints Plan

- | | | |
|-------------------------------------|---------------------------|----------------------------|
| Site Boundary | Existing Vehicular Routes | AQNB |
| Potential Access | Existing Railway | Ancient Woodland |
| Potential Pedestrian / Cycle Access | Existing Vegetation | Registered Park and Garden |
| A51 Noise | Flood Zone 3 | Listed Buildings |
| Existing Allotment | Flood Zone 2 | Local Green Space |
| Existing Local Centre | Public Right of Way | Conservation Area |

- NOTE:
- Reference: 17/25920/REM, Reserved matters pursuant to permission 14/20685/OUT, outline development of 77 dwellings.
 - Site 2 - Suggested note :Reference: 17/25658/REM, Reserved matters pursuant to permission 16/24235/OUT, outline development of 11 dwellings.
 - Site 3 - Suggested note : Reference: 15/22347/REM, Reserved matters pursuant to permission 13/19534/OUT, outline development of 76 dwellings.*



HERITAGE

The Site exists within a locality which has considerable heritage interest. Little Haywood has medieval origins, while Great Haywood was principally developed during the post-medieval period. Both villages contain a number of listed buildings: the church at Little Haywood is Grade II* listed, with the other listed buildings in the villages being Grade II. Immediately to the west of Great Haywood is the 16th-century Essex Bridge, a scheduled monument and Grade I listed building.

To the west of the Site is the Shugborough Estate, established in the early 17th century and subsequently developed into one of the country's finest designed parkland landscapes. The estate is a Grade I registered park and garden (RPG). The Shugborough Estate and the historic cores of Great Haywood and Little Haywood are incorporated into a single conservation area.

Despite this rich baseline, the proposed development will not intersect with, or cause physical damage to, any designated heritage asset, as all of those described above lie outside its boundary. Similarly, it is not anticipated to significantly alter the setting of the Shugborough RPG, or of the historic centre of either village, nor the listed buildings they contain. Changes to the setting of two Grade II listed buildings adjacent to the Site will occur, but this change is unlikely to amount to substantial harm. Any effects on the conservation area, arising from the northward expansion of Little Haywood into agricultural land, could potentially be mitigated through sensitive masterplanning.

LANDSCAPE

The Site does not lie within a nationally or locally designated landscape, however it does lie to the east of Cannock Chase Area of Outstanding Natural Beauty (AONB). From the more elevated parts of the Site to the east there are westerly views of the wooded Cannock Chase AONB and Shugborough Registered Park & Garden and local views of the settlement edge of Little Haywood. The Site is located immediately to the east of Shugborough Grade I Listed Registered Park and Garden separated by Main Street. Glimpsed views towards Main Street are possible from The Staffordshire Way promoted route. There are a number of Tree Preservation Orders across the Site and several Public Rights of Way (PRoW). Users of these PRoW are considered of high sensitivity.

In the wider landscape, long distance views are generally constrained by the enclosure provided by the mature trees and woodland within Cannock Chase to the west, built form within the adjacent villages of Little Haywood and Great Haywood to the north and south and the A51 to the east. The A51 arterial route is enclosed by mature vegetation which filters views of the Site from the open countryside to the east. There is a strong frontage created by existing properties on Main Street which encloses views to the western portion of the Site. However, the local public footpaths which run through the Site permit open views of the Site's interior and the local context, including views back towards the settlement of Little Haywood flanked by the woodland of Cannock Chase.

Visual receptors include vehicles travelling along Main Road, local roads within Little Haywood, users of the local rights of way network, particularly within the Site itself, but also within Cannock Chase AONB and Shugborough Estate (of very high sensitivity) and users of the promoted routes 'The Way for the Millennium' and 'The Staffordshire Way'.

Woodland, hedgerows and hedgerow trees are characteristic of the landscape and have some representation within the Site to varying degrees. The landscape fabric predominantly comprises pasture fields subdivided by managed hedgerows or post and wire fencing with regular mature trees.

ECOLOGY

An Ecological Desk study and walkover of the Site was undertaken in order to assess the ecological value of the Site and the potential for biodiversity enhancement through Site design.

Three international statutory designations (Cannock Chase SAC, Paturefields Saltmarsh SAC and Charley Moss SAC/Ramsar) and four national statutory designations (Rawbones Meadow SSSI, Stafford Brook SSSI, Baswich Meadows SSSI and Blithfield Reservoir SSSI) lie within the potential zone of influence of the Site. Additionally, there are five locally designated green spaces (areas demonstrably special to local communities either for ecological, historic or aesthetic reasons and recognised within the local plan) within the Site.

The intervening distance means that development at the Site is unlikely to have a direct impact on the statutory designations through anything other than a potential increase in recreational impact. Residential impact on Cannock Chase is covered by planning policy that requires financial contributions from developments within 8km of the SAC. Charley Moss is visited by permit only and will not be impacted by increased recreation. The other identified designated sites within the vicinity may also be susceptible to recreational pressure, however the provision of a large amount of public open space within the Site in the form of a community park is likely to minimise such effects. This community park creation will also provide an attractive, rural setting for the development as well as higher quality habitat in the local area to enhance biodiversity, thus minimising the impacts of the loss of the Local Green Space Areas within the Site.

The Site itself is an extensive system of grazed pasture fields delineated by hedgerows, many of which are defunct and species poor. There are two ponds on site and two others within 250m. There is also a stream in the centre of the Site with steep wooded banks. Further detailed botanical surveys will confirm the ecological value of the pasture

and hedgerows but some of the fields and hedges are likely to be of local value along with the ponds and the stream, whilst a majority of the improved pasture fields and defunct hedgerows will be of limited ecological value.

The Site has the potential to support badgers, breeding birds, foraging bats, amphibians including great crested newts, common and widespread reptiles and mammal species of conservation concern, such as hedgehogs. Further survey work is recommended to confirm the presence or absence of these species; however, based on the existing habitats and the masterplan proposals, even if present they are unlikely to pose an 'in principle' constraint to development.

The masterplan for the Site incorporates habitats of higher ecological value within retained and enhanced areas of Green Infrastructure (GI). The creation of a county park provides opportunity to create high quality grassland in line with the identification of the Site within a 'grassland opportunity area'. This high quality habitat will provide important ecological corridors linking the ponds on Site with those nearby thus creating an important habitat network for many species including great crested newt which are known to be in the area. The retention/buffering of many of the internal and boundary hedgerows, as well as selective 'gap' planting with native hedgerow species of local provenance and long-term management for the benefit of wildlife will ensure ecological connectivity within and around the Site is maintained. Where other GI is created, soft landscape enhancements such as wildflower grassland planting and creation of Sustainable Drainage Systems (SuDS) features designed to benefit biodiversity through appropriate design, planting and management will help to achieve a net gain in biodiversity.

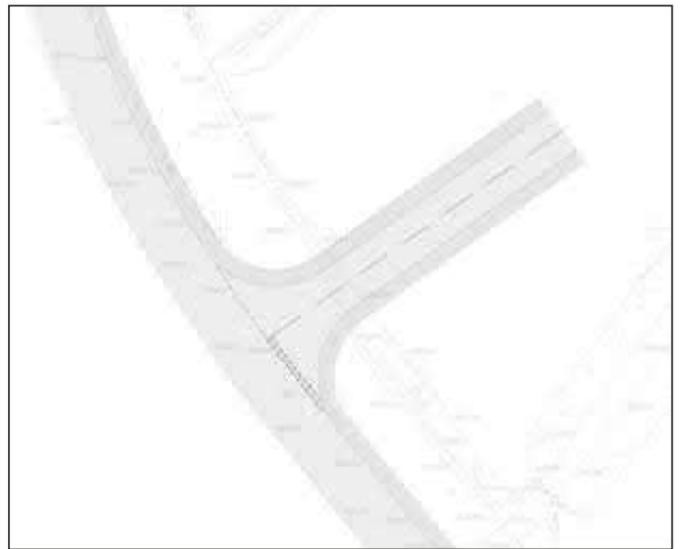
ACCESS AND HIGHWAYS CONSIDERATIONS

The Site is located within a walking distance of local Public Right of Way footpaths, advisory cycling routes and canal towpaths, which enable access to a wide range of local amenities; including health, education, retail and leisure facilities all within the recommended walking and cyclist distances. Bus services operating within an acceptable distance of the Site provide prospective residents with frequent connections to Great Haywood, Little Haywood, Rugeley and Stafford.

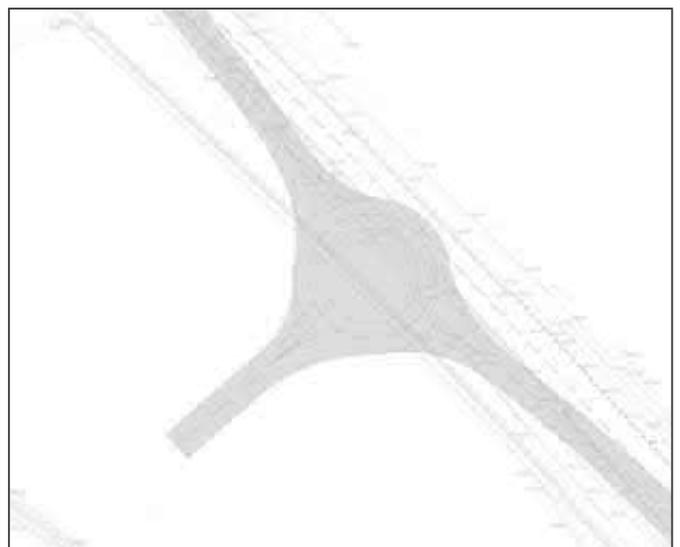
Taking into account the trip rates utilised as part of an approved adjacent residential development, it is envisaged that the proposed development would generate in the region of 209 - 246 and 252 - 298 two-way trips during the traditional highway AM and PM peak periods respectively, depending on the density of the Site. Further assessment will need to be undertaken as part of a future TA to understand any off-site junctions where capacity assessment may be necessary.

It is envisaged that a new priority junction connecting the southern parcel (Phase 1) to Main Road can be provided c. 80m northwest of The Butts. The proposed access will follow the precedent set by that of a prior application (ref: 15/22731/OUT) for a residential development at this location. Access into the northern parcel will be provided via a new roundabout from the A51. On account of the level variations, it is envisaged that this will require some land take within the Site, which will need to be factored into masterplanning and density proposals. A central spine road between the two accesses will provide a vehicular route through the Site, connecting the two residential parcels.

Overall it is envisaged that the necessary infrastructure to support a residential development of c. 400 dwellings is achievable. Furthermore, as a result of the development of several adjacent parcels of land (at varying stages of completion) it is envisaged that the potential future development could serve to enhance sustainable connectivity between Little Haywood to the southeast, and Great Haywood to the northwest of the Site.



The proposed new road junction onto Main Road (the southern site access) (Source: Mode)



The proposed new roundabout junction on the A51 (the northern site access) (Source: Mode)

NON-MOTORISED USER CONNECTIVITY

Additional Non-Motorised User (NMU) accesses could be provided onto Back Lane and Coley Lane, in order to enhance the existing options for pedestrians and cyclists; providing access onto quieter secondary residential streets and catering for one of the primary desire lines from the Site into Little Haywood. As part of the masterplanning and future vision for the Site, the potential to upgrade the existing PRow routes to all weather surfaced shared linkages with lighting should be explored, in order to provide a suitable direct link between Great Haywood and Little Haywood.



Photos showing the existing NMU access points into the Site along the east-west PRow.

5. DEVELOPMENT PROPOSALS - OPTION 1

A number of potential development options have been prepared for the Site following a consistent design framework whilst varying in scale and position to deliver different development options as necessary to suit demand or approach. Options 1 and 2 represent a partial delivery of the Site whilst Option 3 presents comprehensive proposals for the entire site.

GUIDING PRINCIPLES

This development option represents a relatively small intervention of residential development in the southern portion of the Site, accessed from Main Road and extending west from Little Haywood. This proposal creates enhanced public open space on the rest of the Site and largely retains the existing areas of designated local green space whilst compensating for that which is lost. The Concept Masterplan shows the key guiding design principles which underpin the approach to the Site:

- Pockets of development are encompassed within high quality landscape and public open space.
- Primary movement routes permeate the development to ensure connectivity and sustainable transport options.
- Green fingers follow existing landscape features creating highly attractive and safe green movement corridors.
- Areas of attenuation are designed so as to contribute to the drainage strategy, ecological value and provide high quality open space and are informed by the Site topography.

DELIVERY BENEFITS

- This option proposes 2.2 ha (5.4 acres) of Residential Development, delivering approximately 70 new homes at 32 dwellings per hectare.
- This option proposes 3.2 ha (7.9 acres) of Public Open Space, including the relocation of 1.9 ha of Neighbourhood Plan designated Local Green Space.
- There is an existing PRoW which runs up the Site's eastern boundary which will be retained and enhanced as part of the development.

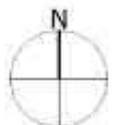


- Site Boundary
- Residential Development
- Primary Movement Route
- Attenuation Area
- Public Open Space



Concept Masterplan

- | | |
|--|--|
|  Site Boundary |  Existing Trees and Hedgerows |
|  Primary Site Access |  Public Open Space |
|  Main Routes |  Green Corridor |
|  Walking / Cycling Routes |  Neighbourhood Plan Local Green Space |
|  SUDs | |
|  Residential Development Area | |



OPTION 2

GUIDING PRINCIPLES

This development option shows a larger area of residential development extended from the south into the centre of the Site. It is accessed from Main Road and again is an extension of Little Haywood along its western edge. The rest of the Site will be enhanced open space, retaining much of the existing areas of designated local green space and compensating for that which is lost. The Concept Masterplan shows the key guiding design principles which underpin the approach to the Site:

- Pockets of development are encompassed within high quality landscape and public open space.
- Primary movement routes permeate the development to ensure connectivity and sustainable transport options.
- Green fingers follow existing landscape features creating highly attractive and safe green movement corridors.
- Areas of attenuation are designed so as contribute to the drainage strategy, ecological value and provide high quality open space and are informed by the Site topography.
- Large areas of public open space will be retained and created as part of the development, exceeding in size the area of currently designated area of local green space.

DELIVERY BENEFITS

- This option proposes 6.7 ha (16.6 acres) of Residential Development delivering approximately 215 new homes at 32 dwellings per hectare.
- This option proposes 6.5 ha (16.1 acres) of Public Open Space, including the relocation of 3.3 ha of Neighbourhood Plan designated Local Green Space.
- Existing PRoWs which cross the Site will be retained and enhanced, improving connectivity for Pedestrians and Cyclists between the Site and Little Haywood.

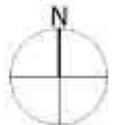


- Site Boundary
- Residential Development
- Primary Movement Route
- Attenuation Area
- Public Open Space



Concept Masterplan

-  Site Boundary
-  Primary Site Access
-  Main Routes
-  Walking / Cycling Routes
-  SUDs
-  Residential Development Area
-  Existing Trees and Hedgerows
-  Public Open Space
-  Green Corridor
-  Neighbourhood Plan Local Green Space



OPTION 3

GUIDING PRINCIPLES

Under this option, we seek to provide a more comprehensive residential scheme which would seek to deliver open space and Local Green Space improvements as part of a larger residential development whilst providing enhanced connectivity for pedestrians and cycles across the Site between Little Haywood and Great Haywood. This proposal also incorporates two vehicular accesses, one from Main Road to the south and one from the A51 to the north. The Concept Masterplan shows the key guiding design principles which underpin the approach to the Site:

- Pockets of development are encompassed within high quality landscape and public open space.
- Primary movement routes permeate the development to ensure connectivity and sustainable transport options.
- Green fingers follow existing landscape features creating highly attractive and safe green movement corridors.
- Areas of attenuation are designed so as contribute to the drainage strategy, ecological value and provide high quality open space and are informed by the Site topography.
- Large areas of public open space will be retained and created as part of the development, exceeding in size the area of currently designated area of local green space.

LOCAL GREEN SPACE REMODELLING

Within the Neighbourhood Plan there are approximately 11.0 ha (27.2 acres) of Local Green Space designated on our site. Our proposals provide for 14.9 ha of public open space, an enhancement of approximately 3.9 ha over and above the current Local Green Space provision and also above the local Public Open Space requirement. The enhancements to accessibility have made this remodelled Local Green Space more connected and more usable with greater amenity whilst providing access through to other local facilities.

DELIVERY BENEFITS

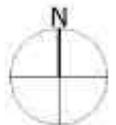
- This option proposes 13.3 ha (32.9 acres) of Residential Development delivering approximately 425 new homes at 32 dwellings per hectare.
- This option proposes 14.9 ha (36.8 acres) of enhanced public open space, including the relocation of 4.8 ha of Neighbourhood Plan designated Local Green Space.
- This option provides an opportunity to deliver a comprehensive solution to Local Green Space improvements. It could enable the delivery of two green corridors moving NE to SW and NW to SE providing enhanced linkages and public open space opportunities for existing and future residents of both Little Haywood and Great Haywood.





Concept Masterplan

- | | |
|--|--|
|  Site Boundary |  Existing Trees and Hedgerows |
|  Primary Site Access |  Public Open Space |
|  Main Routes |  Green Corridor |
|  Walking / Cycling Routes |  Neighbourhood Plan Local Green Space |
|  SUDs | |
|  Residential Development Area | |



ALTERNATIVE OPTION



Concept Masterplan

This alternative option proposes the development of only the northern area of the Site and is an extension to Great Haywood rather than Little Haywood.

DELIVERY BENEFITS

- This option proposes 4.2 ha (10.3 acres) of Residential Development delivering approximately 135 new homes at 32 dwellings per hectare.
- This option proposes 3.7 ha (9.1 acres) of enhanced public open space, this option retains the existing Neighbourhood Plan designated Local Green Space in its entirety.

 Site Boundary	 Existing Trees and Hedgerows
 Primary Site Access	 Public Open Space
 Main Routes	 Green Corridor
 Walking / Cycling Routes	 Neighborhood Plan Local Green Space
 SUDs	
 Residential Development Area	



6. CONNECTIVITY



Two key green corridors form part of the wider public open space strategy within the proposal whilst they also inform the new, enhanced pedestrian and cycle routes which alongside the existing Public Rights of Way on site, make up the Site wide connectivity strategy for Option 3.

EAST-WEST GREEN CORRIDOR

The east-west green corridor creates a large area of public open space, including retained designated Local Green Space land and enhanced public open space for community use. In addition, the east-west corridor will provide an enhanced pedestrian and cycle movement route connecting Little Haywood to Great Haywood through the proposed development. The width of this Green Corridor varies from approximately 140m to 40m.



NORTH-SOUTH GREEN CORRIDOR

The north-south green corridor along the Site's western edge not only creates an accessible, usable green route for movement and amenity from the north to the south of the Site but is also an important buffer against coalescence, maintaining separation between Little Haywood and Great Haywood in perpetuity regardless of potential future developments in the area. The width of this Green Corridor varies from approximately 100m to 55m.

PEDESTRIAN AND CYCLE CONNECTIVITY

As part of the development, new Pedestrian and Cycle routes will be created and existing ones will be enhanced and better defined in order to improve connectivity for the existing communities in Great Haywood and Little Haywood as well as the new community on the Site. These routes retain, enhance and link into the existing public rights of way.



7. GREEN CORRIDORS AND OPPORTUNITIES FOR LOCAL GREEN SPACE ENHANCEMENTS

As part of Development Proposal Option 3 we have the potential to provide a range of Green Corridor and Local Green Space enhancements that we would invite the community to engage in selecting. These will serve not only the new residential community but also the existing communities of Little Haywood and Great Haywood.

Potential to integrate play areas, recreational routes and other community facilities within new connected green corridors



RECREATIONAL CYCLE ROUTES

Recreational cycle routes are cycle routes that offer users the opportunity to cycle without traffic, often along scenic routes, closer to nature. These are important to give people an opportunity to cycle from a health and wellbeing perspective as well as giving children a safe space to cycle and within the context of a residential development, a recreational cycle route through a site can also be useful for visiting local places and people without the need to use roads.



Recreational Cycle Routes are important for learning to cycle (Source: Sustrans)



TRIM TRAILS

Trim Trails are directional outdoor play equipment/climbing frame routes designed to make traversing through a space or along a path more fun, interactive and healthy. There are numerous types of equipment which might be included in a trim trail including monkey bars, balancing poles and stepping stones. Easy access to this activity equipment will help to keep the local community fit and healthy.



Example of equipment on a Trim Trail



ECOLOGY / WILDLIFE HABITATS

Ecology and Wildlife Habitats are specifically designed features to encourage Ecology and Wildlife to flourish on a site. These can be spaces to encourage certain flora growth (such as a wildflower meadow) or fauna (such as a bird house, hedgehog hutch or pond). They are important for environmental reasons, encouraging and maintaining biodiversity whilst also important for our own health and wellbeing with interaction with nature and ecology a scientifically proven health benefit to humans.



Example: A hedgehog 'campsite' (Source: Wales Online)



COMMUNITY PARK

Community Parks can bring communities together. Accessible community parks can be multi-functional in their design, allowing for a variety of uses and users to enjoy them. The parks can vary in their formality, from very informal green areas with mown grass paths through them to more formal equipped areas with picnic benches and play equipment. Community Parks give the local population an area for recreation, somewhere to play and somewhere to walk, jog and cycle through green areas improving their health, fitness and wellbeing.



A Community Park offers great opportunities to socialise and exercise, improving the health and wellbeing of local residents.



MEMORIAL GARDEN

A Memorial Garden provides a place of tranquility and reflection for the local community, a peaceful environment for contemplation with the wellbeing benefits created by being in the open air and in touch with nature. The proposed memorial garden would be highly accessible with access off Main Road and some car parking provision.



A memorial garden creates a peaceful environment for reflection and contemplation.

8. DELIVERING A WELL DESIGNED PLACE

The development has been designed to adhere to best practice place-making principles. It adheres to the guidance within the National Design Guide.

Lifespan

The proposal has been designed with longevity in mind to accommodate potential additions and adaptations in the future. Open space integrated within the development will be communal and encourage a sense of ownership of shared space among residents to ensure their long term amenity.

Resources

The development makes efficient use of land available and is also capable of adapting to alterations in climate, technological advancement and market changes.

Homes and Buildings

The development has been designed to accommodate a range of housing types and tenures to provide for people at every stage of life.

Uses

The development will incorporate a variety of community uses in addition to housing, including enhanced public open green space integrated within the residential scheme.

Public Spaces

Public open space created as part of the development will be integrated within the scheme and overlooked by housing to create spaces which are surveilled and secure. Green corridors permeate development blocks ensuring that open space is accessible to all throughout the Site.



Context

The development will enhance the connectivity and permeability of the surrounding area through the creation of new movement routes.

Identity

The strong relationship between built form and areas of open space in the development give it a strong character that is attractive, identifiable and Site specific.

Built Form

Built form throughout the development responds to Site constraints and opportunities, taking advantage of elevation, green links and movement routes to create a coherent pattern of residential development.

Movement

The development proposes a strong hierarchy of roads for coherent vehicular movement through the Site as well as new and enhanced pedestrian and cycle routes.

Nature

As part of the development, existing landscape will be retained where possible with existing trees and hedgerows permeating development blocks. Existing and proposed landscape and planting will also be made more accessible through the creation of extensive new public open green space.

Character



In accordance with the Key Design Principles, National Design Guide (MHCLG, 2019)

9. BENEFITS SUMMARY & DELIVERABILITY

The development proposals will provide a deliverable, high quality, accessible and connected environment in which to live, rest and play.

These proposals also have the potential for huge benefits for the local area, including:



Public Open Space and Landscaping – extensive public open space including large new usable green corridors, designed around the local landscape with opportunities for the community to be engaged in the review and selection of Local Green Space enhancements which could include comprehensive investment in a new community park.



New Homes – new high quality homes, both market and affordable homes, to meet the local needs, providing growth at Little Haywood which as a Key Service Village is one of the most sustainable settlements in the Borough.



Responsive Design – a carefully considered design which makes use of the local landscape and opportunities afforded by the Site and is both responsive to it and contextually appropriate with opportunities to support the vitality and viability of Little Haywood and Great Haywood existing services and businesses.



Permeability – a legible and accessible Site which champions sustainable modes of travel, use of new facilities and sustainable lifestyles.



Accessibility and Sustainability - At the centre of the design ethos for the proposals are accessibility and sustainability, to support health and wellbeing and a sensitive climate response.



Recent high-quality Bellway Homes development, Studham



Recent high-quality Bellway Homes development, Saxon Fields

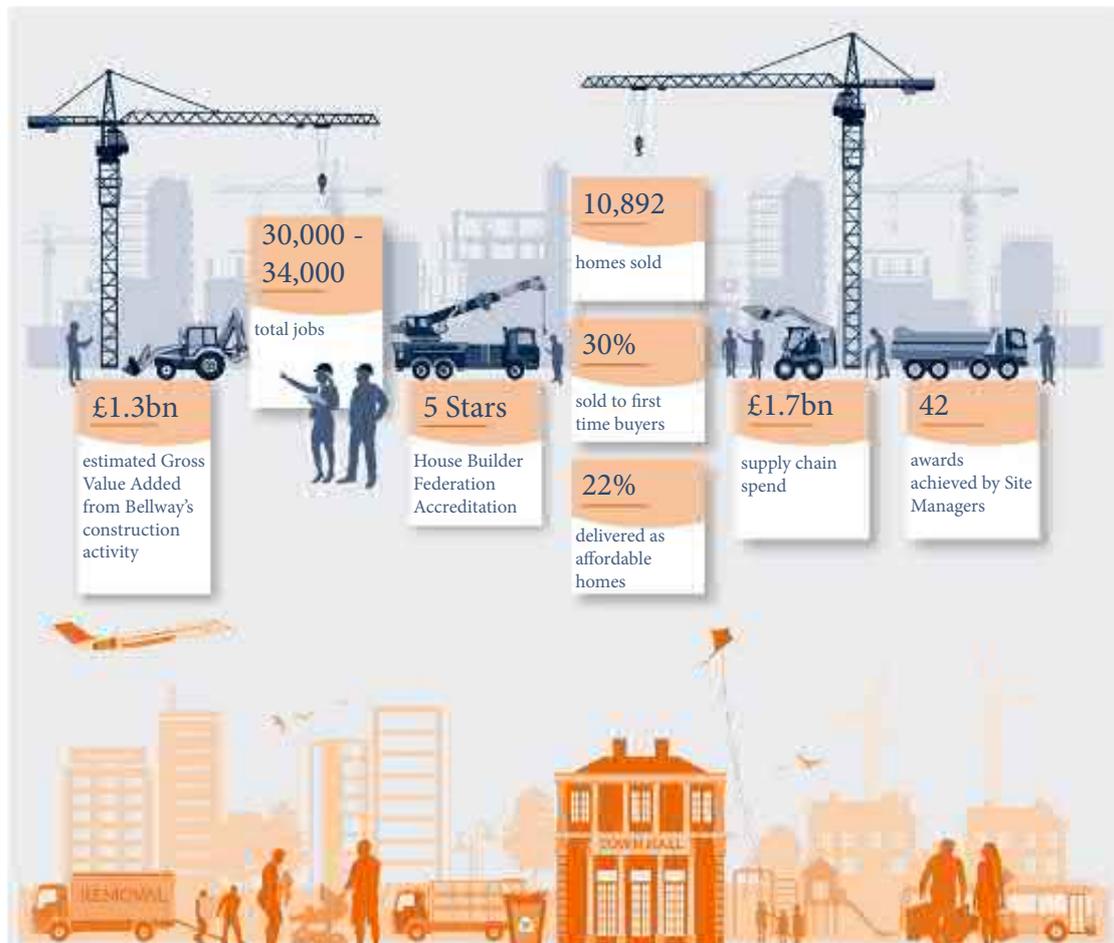
BELLWAY HOMES EXPERIENCE

Bellway is an FTSE 250 major PLC housebuilder delivering just over 10,800 new homes across the UK last year. They are a five star housebuilder as a result of emphasis on build quality, customer care and health and safety, and build and sell high quality homes to suit local housing styles as well as providing social housing to housing associations.

Since their beginning over 70 years ago, Bellway now operate from 22 trading divisions which are located in the main population centres in England, Scotland and Wales. This structure enables their divisional management teams to use their locational knowledge and working relationships to buy land, design, build and sell homes which are attractive to their customers and help to build local communities.

Bellway control this highly sustainable site in Little Haywood. Their experienced multi-disciplinary consultant team have assessed the Site and consider it is available, suitable and developable and can therefore provide a deliverable site of new homes including affordable housing and other potential community uses. The landowners have carefully chosen Bellway as their development partner to ensure a positive legacy locally and seek to deliver community benefits too.

Bellway are fully committed to building and delivering a sustainable development for Little Haywood and would like to work with the Council and the community to make this happen.



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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Ms	
First Name	Joanne	
Surname	Russell	
E-mail address		
Job title (if applicable)	Planning Director	
Organisation (if applicable)	Stoford Developments	
Address		
Postcode		
Telephone Number		

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

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

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

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

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

Please note:

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

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

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Jo Russell		Organisation Stoford Developments			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5.0	Paragraph		Table	
Figure		Question	5.F, 5.O and 5.Q	Other	
2. Please set out your comments below					
<p>Introduction</p> <p>These representations are made by Stoford Developments, who have an agreement with the landowners of Forge Farm, Stone, to promote the site edged in red (Appendix 1) through the Local Plan review process.</p> <p>The site is currently located outside of the settlement boundary for Stone and therefore for development to be more positively received by the Council, an amendment to the settlement boundary is required. We consider that the site is suitable for a range of uses and these can be discussed with officers over the course of the Local Plan preparation.</p> <p>Potential for development</p> <p>Given its roadside location, the site is suitable for the development of a hotel, petrol filling station, and a range of small roadside uses. It may also accommodate a localised retail offer or residential development, as part of a mixed use scheme.</p> <p>It would be Stoford’s preference if the Local Plan review sought to allocate sites for uses such as those outlined above and identified the site (at Appendix 1 of these representations) as one of those representations. At present the Local Plan review seeks to accommodate principally housing requirements and those of B1, B2 and B8 Uses. No consideration is given to the need for petrol filling stations, hotels and roadside services that all offer a range of amenity and service to a local community and visitors, but also, offer a variety of employment opportunities not captured by the assessment of B1, B2 and B8 needs. The Local Plan also does not consider how a mix of these uses, including residential, could be accommodated within small edge of settlement site, as a sustainable development opportunity.</p> <p>These representations respond to Section 5 of the Local Plan, which is concerned with the Spatial Strategy and most align most appropriately with the questions posed within that Section.</p>					
<p>Question 5.F</p> <p>a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest?</p> <p>b) Are there any of these spatial scenarios that you feel we should avoid? If so, why?</p> <p>c) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer</p>					

In response to question 5c, Stoford consider that a combination of spatial strategies (illustrated on page 52 of the Issues and Options Consultation) are necessary. In particular, the scenario of 'intensification around the edges of larger settlements and strategic extensions' is preferred, in respect of the land at Forge Farm.

Paragraph 5.14 of the Issues and Options Consultation states that the adopted settlement hierarchy directs development to Stafford, Stone and Key Service Villages. Stoford support this, and consider it is the most appropriate and sustainable means of development. Naturally, those settlements will need to expand beyond their current settlement boundaries in order to continue to grow.

We support the continued identification of Stone, being recognised alongside Stafford as '*being the most sustainable*' settlements (para 2.12, Settlement Assessment 2018). The Plan for Stafford Borough Part 2 (2018) established the settlement boundaries for Stafford, Stone and the Key Service Villages. That was based upon the development requirements identified within the Part 1 Local Plan and therefore in terms of meeting the development requirement of the Local Plan Review through to 2040, it is appropriate to consider how these boundaries will need to be revised.

Para 4.6 of the Council's Settlement Assessment (2018) states that '*Local employment opportunities provide a positive indicator of vibrant sustainable settlements. The NPPF acknowledges that within rural areas, employment opportunities and community services and facilities are important for sustainable rural communities as they can help enhance community and reduce the number of trips made by car.*' Whilst paragraph 4.7 adds that employment sources include B1, B2 and B8 Uses, it is important to recognise that other Uses including those within the A3, A4, A5 (restaurants, cafes, public houses) Sui Generis e.g. Petrol Filling Stations, and C1 (Hotels) amongst other uses, also provide opportunities for local employment, whilst providing local communities with amenity that is within walking distance and thus enhances the sustainability of a settlement. Paragraph 20 of the NPPF specifically requires strategic policies to '*make sufficient provision for...employment, retail, leisure and other commercial development*' and Section 6 of the NPPF also refers to *business and economic growth*, as opposed to specific Use classes.

Public houses and shops are also seen as services/facilities that provide a key aspect of sustainability. (Para 4.11 of the Council's Settlement Assessment 2018). Paragraph 92 of the NPPF also advises that Local Authorities should plan positively for the provision of facilities such as local shops, public houses and other local services.

The Site is located opposite Stone Business Park and is within walking distance (5 minutes) of the businesses there. The Local Plan Evidence Base (Stafford Borough Strategic Development Site Options 2020) notes that Stone Business Park is a key location that has benefited from recent investment including Jaguar Land Rover. The Business Park needs to expand its offer and attract supporting services, which sites such as Forge Farm can do, if developed. This in turn will strengthen the role of Stone within the settlement hierarchy.

Question 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*

* <https://www.staffordbc.gov.uk/node/227026>

The land at Forge Farm has been assessed within the SHELAA as part of site reference SRUR11. The Assessment of site SRUR11 covered a larger site area than that which is proposed for development within **Appendix 1** of these representations. The larger site included in particular, areas of potential flood risk, and as a result was discounted by the Council. A new Call for Sites Form has therefore been completed and submitted alongside these representations, focusing on a smaller site area. Commentary is made on the SHELAA, later within these representations.

Question 5.Q

Do you agree with the methodology used to define settlement boundaries? If not please provide reasons for your response.

We do not agree with the settlement boundary for Stone. The existing settlement boundary is edged in red and is shown on the plan at **Appendix 2** of these representations. The boundary excludes the Forge Farm site as outlined within our Appendices. The decision to discount the site from offering potential for development and thus inclusion within the settlement boundary, appears to be based upon a desk top review and is missed opportunity in our view to provide a development site, much needed in Stone, given the town's Green Belt and Flood Risk constraints elsewhere. The smaller site area offered by Stoford herein, positively addresses the points made in the conclusions of the Council's SHELAA and the soundness of the Plan.

The following section of these representations therefore focusses on the settlement boundary of Stone, and how the evidence base relates to this. It also highlights the potential to expand the settlement boundary at Forge Farm to accommodate the development of the site identified at **Appendix 1** of these representations and improve the robustness of the evidence base.

Cross reference is also made to other sites that have been considered within the SHELAA that has been undertaken by the Council, and will provide evidence on potential sites that further iterations of the Local Plan can go on to allocate.

The Methodology for Defining Settlement Boundaries

The methodology used to define settlement boundaries follows a three stage process:

Stage 1 - Desk Top Review

Stage 2 - Site Visits

Stage 3 - Incorporation of Development Principles

The desk-top review has missed the potential for the site at Forge Farm to support Stone's economic development. The site is less than 5 minutes' walk for employees at Stone Business Park and offers a great opportunity to serve employees', businesses' and residents' needs for beverages, food and hotel & conference facilities. As a potential mixed use site, there is an opportunity to include residential use within future proposals too. Whilst closely connected to the Business Park, the development of the site would not have any negative impact on any residential areas. It offers an opportunity to improve the environment with excellent landscaping and an opportunity to create a welcome entrance to the town. These are all matters that relate to the suitability of the site and should be reflected on the SHELAA assessment proforma.

The Council's previous reason for rejecting the site due to flood risk has been fully addressed by limiting the site to land in flood zone 1, with a minor incursion in the south eastern corner of the site, that we propose would form part of the green and drainage infrastructure.

The site visit undertaken at Stage 2 of the SHELAA presented officers with an opportunity to identify the potential for this site to have connectivity with the urban area of Stone, via new pedestrian crossings between the site and the Business Park, and also across the A51 towards Stone. These could be funded as a result of the site's development and would overcome the suggested 'physical barriers' that are listed within the SHELAA assessment of this site.

Finally, the third stage of the methodology for defining settlement boundaries is the consideration of **development principles** listed at paragraph 5.94-96 of the Consultation.

Development Principles

The Consultation advises on page 84, that together with Stages 1 and 2 of the Methodology, these Principles will be used to identify the proposed settlement boundaries and the site options for potential new development.

Development Principle 1 – Recognised Physical Features and Land Uses

The Consultation states that '*settlement boundaries should be logical and easily identifiable.*' It is also stated that '*it is proposed to include areas of land which are physically related to the settlement.*'

It is our view that with the extension of Stone at Stone Business Park, to cross Brooms Road, the corresponding development of the Forge Farm site has the potential to provide a similar settlement edge to Stone, when approaching on the A34.

The Stone Data Centre forms a strong built form and edge to Stone when approaching on the A34, however this is not repeated on the opposite side, where the Forge Farm site is without development. Extending the Settlement boundary here to follow the hedgerow and enclose the site identified within **Appendix 1**, would provide an extension to Stone, and follows this Development Principle.

It is our view that the inclusion of the site at Forge Farm within the Settlement boundary can be drawn so as to relate to physical features and land uses and enforce a well-defined edge to Stone.

We turn to explore how physical features, relevant to Development Principle 1, have not been equally applied by the Council in their SHELAA and that this has the potential to undermine an extension to the Stone settlement boundary in a consistent manner.

The SHELAA

a) The consideration of boundaries

The Issues and Options Consultation (2020) highlights the previous panel discussions that have informed the Local Plan, and references that concern has been raised ‘*about the impact of expanding Stone settlement boundary resulting in ill-defined town/countryside edges.*’ This is a relevant and important point, considering the results of the most recent SHELAA (published 2020) which identifies the most significant deliverable site as that which is south west of the Stone Business Park (reference SRUR10). That site, measures 22.3 hectares and would extend Stone further into the surrounding countryside. The current settlement edge at this location is already weak, and the further extension would equally only follow a field boundary. No physical features, buildings, roads, rivers or railways are located here to prevent the continued sprawl of Stone. By comparison, the development of the site at Forge Farm would not result in continued sprawl, because the site is enclosed by the Stafford Road, the A51 and the existing buildings at Forge Farm to the south. **Appendix 2** clearly demonstrates this.

The SHELAA assesses the site at Forge Farm (SRUR11) and concludes that the site is not deliverable because it has physical constraints and this is directly relevant to Development Principle 1, above. The SHELAA advises that the A51 creates a ‘physical barrier’ which is inconsistent with the assessment made for other sites within Stone which have been viewed more favourably by the Council. For example:

SHELAA Site ref.	SHELAA Assessment	Stoford Comments
SRUR10 Yartlet (2) Staffordshire County Council, County Farm	Available, Suitable and Achievable.	The site’s boundary with Stone is shared with the rear of the Stone Business Park, thus offering no physical connectivity to Stone . The Business Park creates a physical barrier to the Yartlet(2) development site . Those living or working within the proposed site will necessarily need to leave the site via Pirehill Lane, to access Stone. Nonetheless the SHELAA concludes that the site is suitable. However the SHELAA does not conclude that the Forge Farm site is suitable, and instead of assessing the A34 or A51 positively, the Assessment concludes these to be barriers, when these instead should be considered to be linear connections.
SRUR13 Land Adj. to A34 Stone,	Available and Achievable, but not suitable due to Green Belt	Whilst the site is not considered to be suitable, the reason stated for this is one of Green Belt.

		<p>The canal is not perceived as a physical barrier within the Council's Assessment for this site. Similarly, it is our view that roads are generally not perceived to be barriers. Likewise, the A34 should not be treated as a barrier, but instead treated as a linear connection to the town.</p>
--	--	---

It is not consistent in the Assessment for the Council to state that the Forge Farm site is 'unsuitable' because of a physical barrier (the A51), when a site such as Yartlet (2) is considered to be 'suitable' and demonstrates physical separation from Stone as a result of the adjacent Business Park (which is an impenetrable barrier), and is also only connected to Stone by the Pirewell Road.

Aerial map observations of the A34 approach to Stone demonstrate development on both side of the A34, including housing on the north western side. The proposed development site is entirely consistent with the existing pattern of development between the A34 and the river, that characterises the east bank of the River Trent.

b) The consideration of site constraints

Stage 1 of the Council's Methodology to inform Settlement Boundaries includes mapping flood zones. These then have a bearing on the SHELAA consideration of sites, including Forge Farm.

We also do not consider that the Council's Assessment is consistent in terms of the 'Suitability Assessment' that is stated on the site proforma for Forge Farm, when compared to that of SRUR10 Yartlet (2) for example. The Forge Farm site proforma states:

The site does not fall within, or is positioned adjacent to, a currently recognised Local Plan settlement. The following constraints are known to exist: Flood Zone.

However the same assessment for the SRUR10 Yartlet (2) site is:

The site is adjacent to the currently recognised Local Plan settlement of Stone. The current use will need to be relocated. The following constraints exist: Public Right of Way, Historic Environment Record, landfill, mineral deposits.

In response to this, we have annotated the adopted Local Plan Part 2 Proposals Map (Appendix 2) with both sites, one shaded pink, and one yellow. The relationship to the settlement is clear, and the Assessment is incorrect in stating that the Forge Farm site is not positioned adjacent to the Local Plan Settlement of Stone. The positioning of the site is equal to, if not better than the Yartlet(2) site – given the latter is outside the settlement boundary and is not capable of a direct connection, nor is it visibly connected, due to the rear boundaries of the Stone Business Park.

The Council considers the Yartlet(2) site as being potentially developable, as opposed to the Forge Farm site which they do not consider to be. Given the constraints presented within the Yartlet(2) site proforma – the presence of a Historic Environment Record, landfill, mineral deposits, and a Public Right of Way, these are all planning constraints that will take time to overcome and address, and potentially constrain the developable areas within the site. Some areas may not be suitable for development as a result of ground conditions related to landfill or mineral deposits; the PROW may affect the proposed layout and thus capacity of the site and so forth. These however appear to have not curtailed the Council's positive view of the site in their Assessment. By comparison, the Forge Farm site has been assessed by the Council and dismissed as being suitable, with reference to there being a Flood Zone on site.

An extract of the 'Gov.uk' flood risk mapping for the site is shown below and illustrates only a minor part of the south eastern corner of the site is at risk of flooding. Should the Council be minded to allocate this site for development, a policy could be suitably worded to require the layout of the site to avoid development within the minor area of flood risk, and to utilise the area for appropriate drainage/landscaping for example.



Development Principle 2 – Sites with Planning Permission and Land Excursions

A second Development Principle that is set out within the Local Plan (section 5) as being used to identify changes to the boundaries or site options for development is one where sites have existing or where there are small scale development opportunities.

The latter applies. The Consultation advises at paragraph 5.97 that settlement boundaries will include ‘*small scale development opportunities that are **physically, functionally and visually** related to the existing urban area.*’

The Forge Farm site can be **physically** related to Stone, through a pedestrian crossing that could connect the developed sides of the A34 or the A51 with the site. It is of note that the site reflects characteristic ‘M1- an integrated network of routes for all modes of transport’, as referenced with the National Design Guide (October 2019). The development of the site would ‘round off the settlement’ – bringing development here, aligned with the Stone Data Centre on the opposite side of the A34.

Functionally the site if developed for mixed use, could provide a range of food and beverage opportunities to serve the local community and those within Stone Business Park. We note that Policy E8 is applicable here.

Para 2.2.6 of the Issues and Options Consultation advises that ‘*Policy E8 also states that development proposals at Stafford (>1,000 sq. m gross) and at Stone (>500 sq. m gross) for town centre uses in an edge or out-of-centre location should be the subject of an impact assessment. For local centres, the threshold should be 300 sq. m gross.*’ However it is noted within the Stafford Main Town Centre Uses Study (para 4.2.9) that ‘*In terms of food and drink retailers, Stone*

Town Centre is above average, in terms of both the proportion of units and the proportion of floorspace. Costa is the only national multiple present in this sector; however, there are many independent cafés and restaurants’.

Given Stone Town Centre has a strong offering of food and beverage offerings, the allocation of further outlets within the centre is not likely to be required, based on the above evidence. However, in terms of serving communities on the southern neighbourhoods of Stone, those adjacent business communities and those commuting on the A34, the Forge Farm site offers significant potential and a specific need.

Paragraph 2.3 of the Issues and Options Consultation states that ‘135,880 people currently live in the Borough and this is expected to grow by around 8.5% between 2014 and 2034 leading to an increased demand on services and facilities.

Visually the Forge Farm site is a gateway site, visually connected to the Stone Business Park, including the Data Centre, and the local cemetery on the edge of the A34/51 which is visible from the site, as is the site, when viewed from the pavement at the cemetery.

Development Principle 3 – Settlement Boundaries do not need to be contiguous

Finally, it is acknowledged within paragraph 5.98 of the Consultation that boundaries do not need to be contiguous. Therefore, it is reasonable to extend the settlement of Stone to include Forge Farm and cross the A34 (and A51) as has already been done previously, given Stone as a settlement, spans the A34 carriageway.

Conclusions

In assessing the merits of the Forge Farm site, and the need to focus growth on the extension of key settlements like Stone, and the opportunities for doing so, it is clear that an opportunity to redraw the settlement boundaries of Stone can be taken and without detriment to other policies within the Plan. The evidence base that will underpin the next stages of the plan has been examined and it is apparent that there are some anomalies that need to be redressed. The site at Forge Farm should be considered (see Call for Sites form) as capable of development without utilising land within the Flood Zone, and can deliver improvements via pedestrian crossings, that can improve the connectivity of the site.

Stoford are prepared to work positively with the Council throughout the Local Plan process to ensure the emerging Local Plan is robust and makes the most of all opportunities to support the Borough’s economic development. We trust that the Council can look to extend the settlement boundary of Stone on this basis. We would also like to work with the Council towards an allocation of the site for development as outlined within these representations.

Appended: Appendix 1 - Site boundary plan and call for sites form, Appendix 2 – Plan comparing the location of the Forge Farm site to that of Yartlet(2)

Please use a continuation sheet if necessary

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

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

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

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

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

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

How we will use your details

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

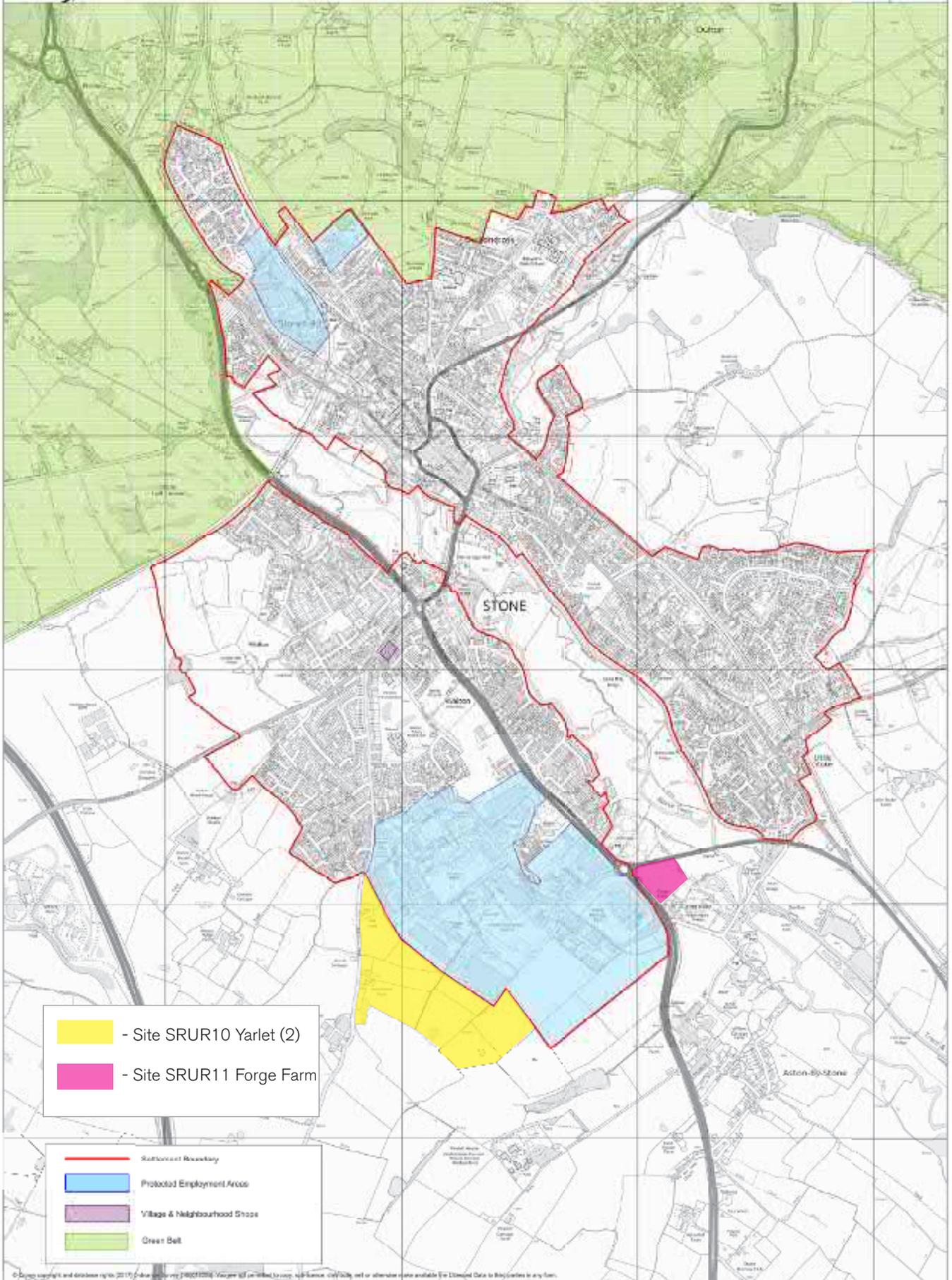
Stafford Borough Council will consider all representations received, using them to inform the next stage of the process for the New Local Plan 2020-2040.

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

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

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Ministry of Housing,
Communities &
Local Government

Kit Malthouse MP
Minister of State for Housing

**Ministry of Housing, Communities and Local
Government**

[Redacted]

[Redacted]

www.gov.uk/mhclg

Our Ref: 4287292

18 June 2019

Extract from a redacted letter from Kit Malthouse MP, Minister of State for Housing: June 2019

"This Government is committed to making the housing market work for everyone and to increasing access to home ownership. We recognise that Rent to Buy can help people to achieve this.

.....

"In the revised NPPF, we expanded the definition of affordable housing to include a greater range of affordable routes to home ownership, including Rent to Buy. There are no specific or implicit barriers in existing planning policy or guidance that would prevent local councils from accepting Rentplus properties as affordable housing. This is demonstrated by Rentplus having reached agreement on the properties it has secured to date."

[Redacted]

KIT MALTHOUSE MP



T: [REDACTED]

E: [REDACTED]

W: [REDACTED]

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

Date: 21 April 2020

Our Ref: JR M15/0715-332

By email only:
forwardplanning@staffordbc.gov.uk

Dear Sir/Madam

RE: STAFFORD BOROUGH LOCAL PLAN 2020-2040: ISSUES AND OPTIONS CONSULTATION

Thank you for the opportunity to comment on the emerging Stafford Local Plan. We represent **Rentplus UK Ltd**, an innovative company providing **affordable rent-to-buy housing** for hard-working people aspiring to home ownership. Rentplus provides an accessible route to achieve their dream through the rent - save - own model. Households rent the property for a defined period at an affordable rent and then receive a gifted 10% deposit upon purchase. Rentplus has recently been recognised by the National Housing Awards as the Most Innovative Home Ownership Solution for 2019.

The first section of these representations introduces the Rentplus model and sets out recent developments which underline the importance of the rent-to-buy model. The second section provides specific comments on the emerging Local Plan.

Introducing Rentplus

The Rentplus model of affordable rent-to-buy aims to help those hard-working families and households unable to access ownership either through shared ownership, starter homes or homes on the open market, to overcome the mortgage 'gap'. This is achieved through a defined period of affordable Intermediate Rent at no more than 80% of local market value (including service charge) during which all Rentplus residents are able to save towards a deposit to supplement the 10% gifted deposit received from Rentplus.

It is important to note that in 2018 the National Planning Policy Framework (the 'Framework') was revised to incorporate a wider definition of affordable housing, now providing four categories; rent-to-buy is included within category d) Other affordable routes to homeownership. The revised Framework also expanded the scope of 'Affordable housing for rent' to include not just 'traditional' affordable and social rented housing, but any scheme which meets criteria where the rent is at least 20% below local market rents, where the landlord is a registered provider, and where any public subsidy is recycled for future provision. Rentplus (working with its partner Registered Providers) meets each of these criteria; it does not rely on public subsidy and therefore there is no requirement to recycle it. The then- Planning Minister confirmed in a letter in 2019 that Rentplus meets the Government's expectation of rent to buy (see **Appendix 1**).

In this context, the Rentplus model is a hybrid and falls within both categories of affordable housing, as either part of the 'affordable housing to rent' element, or as an 'affordable route to home ownership'. This has also been recognised by several councils including those in the South West, South East, East Midlands and East Anglia, with whom Rentplus has worked to deliver affordable rent to buy housing.

The Rentplus model offers the opportunity for the Council and Registered Providers (RPs) to diversify the local housing offer without further recourse to public subsidy. The affordable rented period provides

families and households with security of tenure, with certainty of management and maintenance by a local partner RP, and critically the opportunity to save towards purchase. As affordable rent to buy meets needs for affordable rent (the only difference being marked by the expectation by all parties of purchase), it comes with a significant benefit of freeing up existing affordable rented homes for others in priority need, as demonstrated by Rentplus schemes across England. Rentplus works with a wide range of Registered Providers.

In diversifying the overall housing mix, Rentplus can help to create mixed and balanced communities. Rentplus tenants are on a clear path to homeownership, meaning they are more likely to remain in their property for the long-term and therefore better settle into their community. This helps to create a stronger sense of place in new developments in the long run.

Comments on the draft SPD

The Council's decision to prepare an up-to-date Local Plan is welcomed as it will ensure the Council is well-placed to meet its needs for new housing, including affordable housing in all its tenures. As noted at paragraph 2.7 of the Issues and Options paper, housing affordability in Staffordshire is worsening over time. This is in the context of the findings of the Economic and Housing Development Needs Assessment 2020 (EHDNA), paragraph 11.17 of which notes that 54% of existing households in Stafford cannot afford to purchase a house, rising to 59.1% of newly forming households.

In seeking to address the housing needs of the Borough, it is important that the Council considers the needs of those households which earn enough that they do not require or qualify for social rented housing, but not enough to purchase a home on the open market. The recent report of the Affordable Housing Commission (March 2020) identifies a cohort of some 1.6 million 'Frustrated First-Time Buyers' across the country, of which some 0.3 million reside in social rented housing. At the local level, the EHDNA 2020 identifies a wide income gap for such households (paragraph 13.30 and figure 13.5) in Stafford Borough. Those households with incomes between £21,103 and £34,903 risk being 'trapped' in the private rented sector or needlessly occupying social rented housing, unable to afford to purchase a home at the lower quartile of the housing market. This assumes that such households are able to raise a 16% deposit which in Staffordshire would stand at £24,000; this would take many years for those households not fortunate to access inherited wealth or the 'Bank of Mum and Dad'.

In this context, Rentplus can help the Council to meet the needs of these households, placing them on a clear path to home ownership, and in many cases releasing existing social rented housing. The 10% gifted deposit helps households to overcome the deposit barrier and the Affordable Housing Commission notes that the gifted deposit approach typically is more successful in helping households into home ownership.

The Issues and Options paper contains relatively little detail on the matter of affordable housing tenures and does not ask any questions on this specific issue. This is an important facet of affordable housing policy and **we recommend that the Council undertakes further work to understand the need for affordable rent to buy homes**. Rentplus has worked with Lichfields in 2019 to develop a methodology for the assessment of affordable rent to buy homes, which is included at **Appendix 2**. As Lichfields also prepared the EHDNA, it would be appropriate for them to review this to ensure that the most appropriate affordable housing mix is identified.

In policy terms, the Issues and Options paper rightly identifies paragraph 64 of the Framework which requires 10% of the total number of homes on qualifying sites to be for affordable home ownership. **Paragraph 64 should be reflected in any emerging tenure policy** having regard to the identified needs for affordable rent to buy.

Finally, in response to questions 8D and 8E, **it is recommended that nationally described space standards are not applied** since they can impact upon scheme viability in some cases. In turn, this will prevent the Council from maximising the delivery of affordable housing.

Summary and Conclusion

Rentplus can assist in meeting local need, allocating all of its residents through the Housing Allocation Scheme; by enabling real savings to be built while renting at an affordable rent the Council can help

meet the needs of low and middle income households, providing greater choice and flexibility in the planning system.

The Issues and Options paper and its evidence base point towards a clear need to deliver the full range of affordable housing tenures. Affordable rent to buy helps households to overcome the deposit barrier and access home ownership; in Stafford, there is a significant cohort of households who neither qualify or need social rented housing but are equally unable to access home ownership. The emerging Local Plan and its evidence base including the EHDNA should therefore be carefully considered to ensure that policies allow for this innovative tenure to come forward.

We trust the above comments are of assistance to the Council. Should the Council wish to discuss how affordable housing delivery and rent-to-buy can best meet local needs in Stafford, please get in touch. We would like to be notified of further consultations; please notify **Tetlow King Planning** as agents of Rentplus by email only to [REDACTED].

Yours faithfully

[REDACTED]

JAMIE ROBERTS MPlan MRTPI
PRINCIPAL PLANNER
For and On Behalf Of
TETLOW KING PLANNING

[REDACTED]

Appendices: Appendix 1: Letter from Kit Malthouse MP, 2019
Appendix 2: *Affordable rent to buy homes: Methodology for assessing the need for rent to buy*, Lichfields, 2019

Affordable rent to buy homes Methodology for assessing the need for rent to buy

Update report

Rentplus

February 2019

LICHFIELDS

LICHFIELDS

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Executive Summary

This report has been prepared by Lichfields on behalf of Rentplus. It provides an updated approach for assessing the need for affordable rent to buy homes, based on the revised National Planning Policy Framework (NPPF) (July 2018) and Planning Practice Guidance (PPG).

“Affordable rent to buy” housing provides a route to home ownership for people who are currently unable to purchase a property on the open market but are not considered a priority for social or affordable rented accommodation. Affordable rent to buy homes are therefore helping to address the specific needs of a given section of the population whose needs are currently not being met by the traditional (market or affordable) housing tenures.

The Rentplus model provides an accessible route to home ownership for those who cannot currently purchase a house on the open market for a variety of reasons, including the inability to provide a deposit, but who would otherwise not be considered a priority, or qualify for social or affordable rented homes.

The affordable rent to buy tenure is now specifically included in the new NPPF definition of affordable housing, as one of the affordable routes to home ownership *“for those who could not achieve home ownership through the market”* (NPPF Annex 2). Accordingly, the updated PPG process for assessing the need for affordable housing now includes assessing past trends and current estimates of *households “that cannot afford their own homes, either to rent, or to own, where that is their aspiration”* (ID: 2a-23-20180913).

This report sets out a robust methodological approach to undertaking an assessment of need for affordable rent to buy housing. The demonstration of substantial need for affordable rent to buy properties can form part of the evidence base in support of any planning application for development comprising or including this tenure. The methodology can also be applied at the plan preparation stage in identifying the scale of need for this type of housing, which can be supported by housing allocations and appropriate strategic policies.

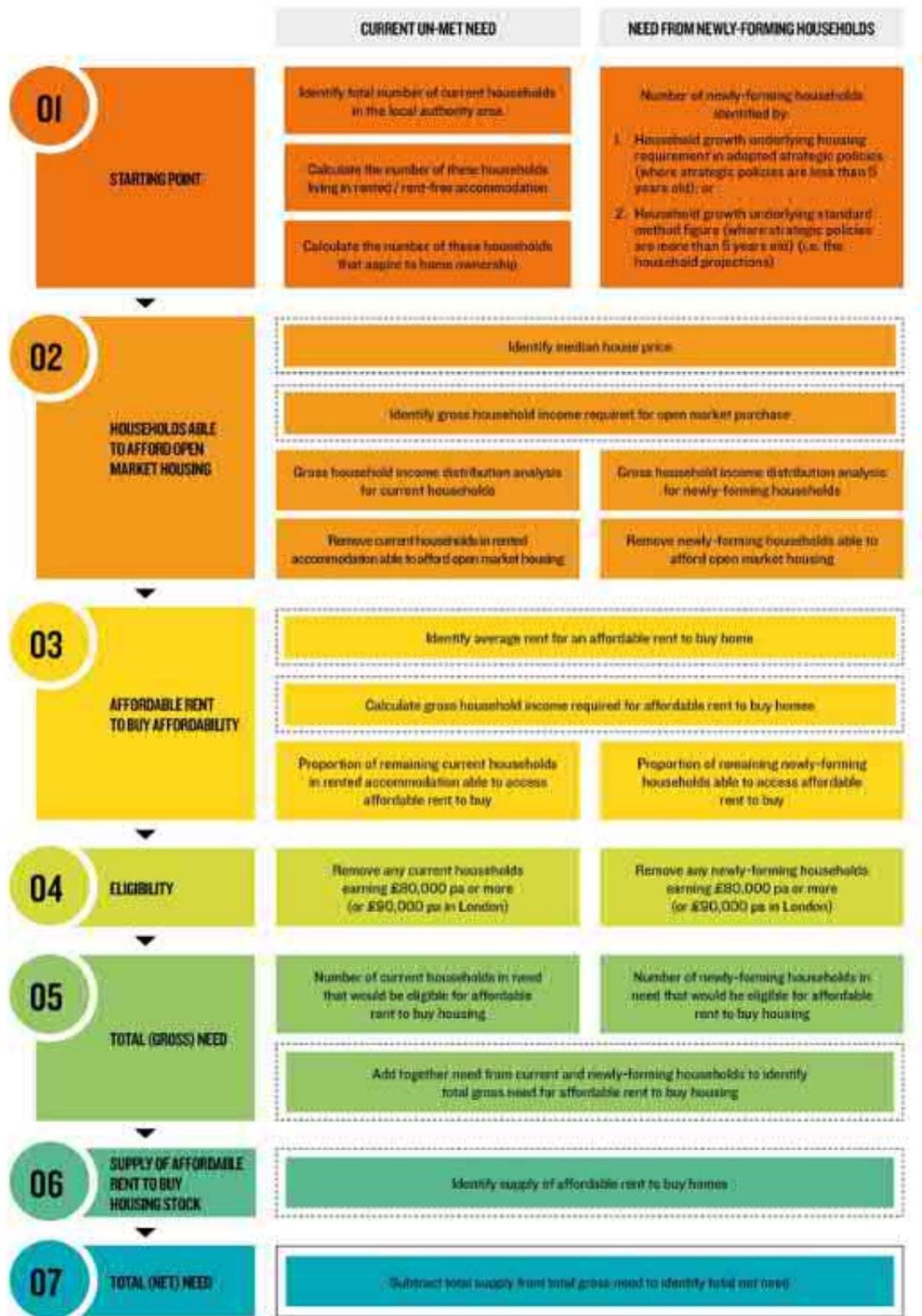
This updated methodology follows the process outlined in the PPG, which:

- 1 Considers the need for affordable homes arising from both current households in need and from newly-forming households; and,
- 2 Combines these two sources of need to indicate the total gross need; before,
- 3 Subtracting the existing available accommodation of this type in order to identify the total net need to be addressed.

The assessment should be performed at a local authority level, in order to align with the standard method and overall assessment of need for affordable housing.

Figure 1 provides a summary of this methodology.

Figure 1 Methodology for assessing the need for affordable rent to buy homes



Source: Lichfields

Contents

1.0	Introduction	1
	The Rentplus affordable rent to buy model	1
	Planning policy context	2
	The problem of declining affordability and the need for affordable rent to buy	6
2.0	Methodology	8
	PART A: Current situation	8
	PART B: Assessment of need for affordable rent to buy	9
	Summary	16
3.0	Conclusion	19

Figures

Figure 1 Methodology for assessing the need for affordable rent to buy homes	2
Figure 2 The standard method for assessing local housing need	4
Figure 3 Potential first-time buyer households if affordability barrier removed	11
Figure 4 Affordability modelling	13
Figure 5 Assessment of need for affordable rent to buy housing	17

Tables

Table 2.1 Demographic and housing profile metrics	8
Table 2.2 Housing stock metrics	8
Table 2.4 Assessment of need for affordable rent to buy housing (equation)	18

Appendices

Appendix 1: Data sources

1.0 Introduction

- 1.1 This report has been prepared by Lichfields on behalf of Rentplus. It provides an updated approach for assessing the need for a relatively new housing tenure known as “affordable rent to buy” at a local authority level, based on the revised National Planning Policy Framework (NPPF) (July 2018) and Planning Practice Guidance (PPG).
- 1.2 “Affordable rent to buy” housing provides a route to home ownership for people who are currently unable to purchase a property in the open market but are not considered a priority for social or affordable rented accommodation.
- 1.3 The proposed methodology within this report is based upon the housing product offered by Rentplus but its principles are applicable to the affordable rent to buy tenure as a whole.

The Rentplus affordable rent to buy model

- 1.4 The Rentplus model provides an accessible route to home ownership for those who cannot currently purchase a house on the open market for a variety of reasons, including the inability to provide a deposit¹, but who would otherwise not be considered a priority, or qualify for social or affordable rented homes.
- 1.5 Rentplus has provided the following details regarding its affordable rent to buy product:
- 1 Rentplus homes are made available on five-year renewable assured shorthold tenancies (AST) at an affordable rent and are managed by a housing association, which also provide a full repair and maintenance service.
 - 2 Prospective tenants/purchasers are assessed for eligibility for a Rentplus home based on their current income and future prospects. This is also used to determine when they will have the opportunity to buy their home at either 5, 10, 15 or 20 years at which time it is expected the home will be purchased by the tenant at open market value with a benefit of a 10% gifted deposit from Rentplus to add to their own savings.
 - 3 The Rentplus model aims to assist purchasers in saving for their purchase costs and to add to the Rentplus deposit by paying a reduced (affordable) rent rather than a private market rent for the duration of the tenancy, as well as improving their credit rating. The rent charged on a Rentplus property is an Affordable Rent, which is set at the lower of 80% open market rent or LHA, and includes services charges. Tenants have no repair or maintenance responsibilities whilst they are renting the property.
 - 4 If the tenant is not able to buy their home at the date agreed at the start of the tenancy arrangements are in place to manage this:
 - a If possible, Rentplus will substitute the planned purchase with that of a tenant who originally planned to buy their home at a later date but is able to bring forward the purchase of their own home. This allows the first tenant to remain in their home with a further five-year AST and more time to prepare for their purchase.
 - b If this is not possible, Rentplus will offer the property for sale to the managing housing association with a 10% discount on the open market value. The housing association will then determine the most suitable use for the property as an affordable home, which could be to continue to rent to the current tenant or to offer the home under a shared ownership model.

¹ Rentplus website, FAQs

- c If neither the tenant nor the housing association purchases the property, the property will be sold on the open market, and 10% of the sales proceeds net of Rentplus' costs will be paid to the local authority to reinvest in new affordable housing provision.

Planning policy context

Providing a range of homes

- 1.6 The revised NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. The “social” pillar of sustainable development at paragraph 8(b) of the NPPF recognises the importance of providing a range of homes:

“to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.”

- 1.7 The NPPF states at paragraph 61 that planning policy should reflect the size, type and tenure of housing needed for different groups, including those who require affordable housing. Paragraph 62 states that planning policy should specific the type of affordable housing required.

Rent to buy as affordable housing

- 1.8 Affordable housing is defined in Annex 2 of the revised NPPF as “*housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)*” and also falls into one of the four categories provided:

- 1 Affordable housing for rent;
- 2 Starter homes;
- 3 Discounted market sales housing; and,
- 4 Other affordable routes to home ownership.

- 1.9 The affordable rent to buy tenure is now specifically listed as one of the affordable routes to home ownership under category 4 above “*for those who could not achieve home ownership through the market*”. The NPPF states that rent to buy would include a period of intermediate rent.

- 1.10 Other types of homes offering affordable routes to home ownership include shared ownership schemes, equity loans (including the Government’s Help to Buy (equity loan) scheme), and low-cost homes (priced at least 20% below the market value).

- 1.11 Affordable rent to buy homes offer a housing solution that meets the needs of households that are looking to secure their own home immediately but are not necessarily in a position to obtain a mortgage, often due to having a lower credit rating. By contrast, for shared ownership and equity loan schemes tenants will usually need to obtain a mortgage in order to access the scheme.

Comparison with intermediate rented housing

- 1.12 “Intermediate rented” homes are offered only for rent and do not offer the option to buy. Intermediate rented homes fall under the “Affordable housing for rent” category in the NPPF (Annex 2), and are subject to the following requirements:

- 1 The rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable);
- 2 The landlord is a registered provider, except where it is included as part of a Build to Rent scheme; and,

3 It includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

1.13 In accordance with the first requirement above, the defining feature of intermediate rented housing products is that the level of rent is set at a rate above social rent but (at least 20%) below market level.

1.14 Affordable rent to buy housing differs from intermediate rented housing as it offers the option to buy and it is not required to comply with the three conditions above.

Intermediate housing: A broader term

1.15 Whilst not present in national planning policy, the broader term “intermediate housing” is used to refer to a range of homes either for sale and/or rent provided at a cost above social rent but below market levels. This wider category would therefore include the affordable rent to buy tenure.

1.16 Some, but not all, intermediate housing products offer the opportunity for tenants to purchase the property, which could be offered via a shared ownership or shared equity arrangement or a discount on the market value of the home.

1.17 By way of example, the GLA Affordable Housing and Viability Supplementary Planning Guidance SPG provides a summary of the “London Living Rent” (LLR) scheme, a type of intermediate affordable housing that is intended to assist households to save for a deposit to purchase their own home through offering low rents on time-limited tenancies. Under the scheme, the Registered Providers that manage these homes are expected to “actively encourage” tenants into home ownership and to offer tenants the right to purchase their LLR home on a shared ownership, basis. However, whilst in most cases tenants of LLR homes delivered in partnership with the GLA can purchase their home at any time during the tenancy, for homes offered by Build to Rent providers, there is no requirement for the provider to sell the home to the tenant.

1.18 The Rentplus affordable rent to buy product shares some characteristics with the LLR scheme but it differs in that it guarantees the tenant’s right to purchase their home.

Local housing need assessment: Standard method

1.19 The revised NPPF formally introduces the standard methodology for the assessment of housing need and states that this should underpin local housing needs assessments which are required to inform strategic policies – unless exceptional circumstances justify an alternative approach.

1.20 Paragraph 60 of the revised NPPF states:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals...”

1.21 The standard method, which takes as its starting point the most recent household projections published by ONS, can be summarised as follows:

Figure 2 The standard method for assessing local housing need



Source: Lichfields, based on NPPF and PPG

1.22

The PPG clarifies at Reference ID: 2a-10-20180913 that the standard method provides the “*minimum starting point*” in identifying the actual number of homes needed. Local planning authorities may consider applying an uplift to the standard method figure in circumstances including, but not limited to:

- 1 Where growth strategies are in place, and particularly where these identify that additional housing above historic trends is needed to support growth;
- 2 Where strategic infrastructure improvements are planned that would support new homes;
- 3 Where strategic infrastructure improvements are planned that would support new homes;
- 4 Where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities;
- 5 Where previous delivery indicates a greater level of need; and,
- 6 Where recent assessments of need, such as a Strategic Housing Market Assessment, indicate higher levels of need.

Proposed changes to the standard method

- 1.23 On 26 October 2018 the Government published a consultation on changes to the standard method. The proposed changes respond to the results of the ONS 2016-based household projections (released 20 September 2018), which anticipate annual levels of household growth that are 24% lower across England than those in the 2014-based projections. This reduction has a significant impact on the standard method figures for many local authority areas.
- 1.24 The Government's consultation proposes that, for the short term, the 2014-based data will provide the demographic baseline for the assessment of local housing need. The document also proposes that the standard method will be reviewed in order to establish a new formula by the time the next projections are issued.
- 1.25 The consultation period closed on Friday 7 December 2018. Paragraph 20 of the consultation report states that:
- "...For decision making, any proposed revisions would apply from the day of publication of the revised planning practice guidance, unless otherwise stated."*
- 1.26 It is not currently known when the revised PPG will be published, or what form the final approach might take, although the consultation document provides the clear Government direction of travel.

Which housing need figure?

- 1.27 When assessing five-year housing land supply, the NPPF states at paragraph 73 that, in areas with adopted strategic policies that are less than five years old, the housing requirement figure within these policies is to be used to represent the housing need for the area.
- 1.28 In areas where strategic policies are more than five years old, the standard method is used to identify the local housing need figure. However, it is noted that this figure would not account for any unmet need from neighbouring areas and, as set out above, local planning authorities may make an upward adjustment to the standard method figure as part of the plan making process.
- 1.29 Hence, when calculating the need for affordable rent to buy homes in areas with adopted strategic policies that are less than five years old, the housing requirement figure within these policies should be used as the starting point. In areas without up-to-date strategic policies, the standard method housing need figure should be used.

Assessment of need for affordable housing

- 1.30 The NPPF states at paragraph 61 that the need for each size, type and tenure of housing, including affordable homes, should be undertaken within the context of the overall local housing need figure, together with any additional needs that cannot be met in neighbouring areas.
- 1.31 The PPG notes at Reference ID: 2a-20-20180913 that the need for housing for particular groups may exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is due to the needs of particular groups being calculated in relation to the whole population of area rather than the projected new households, which form the baseline for the standard method. Once the need for a particular group has been assessed, it is up to the strategic policymaker to consider how this can be addressed within the constraint of the overall need.
- 1.32 The PPG provides the methodology for calculating total affordable housing need at Reference ID: 2a-23-20180913 to 2a-27-20180913. This approach now includes a requirement to assess past

trends and current estimates of households “that cannot afford their own homes, either to rent, or to own, where that is their aspiration” (Reference ID: 2a-23-20180913).

- 1.33 Strategic policy-making authorities should therefore calculate the need for homes providing affordable routes to ownership, including rent to buy, as part of their affordable housing need assessment. Our updated methodology for conducting this assessment, in accordance with the requirements of the revised NPPF and PPG, is provided in Section 2.

The problem of declining affordability and the need for affordable rent to buy

Declining affordability

- 1.34 The problem of declining affordability for younger households is acknowledged within the Explanatory Notes supporting the Housing and Planning Act 2016 (paragraphs 7 and 8):

“Although now abated, the long-term downward trend in owner occupation has disproportionately affected younger households. Of those households that do own their home 75% are over the age of 45 and nearly half (46%) of households in the 25-34 age group live in the private rented sector (only 21% were renting privately in 2003-04). Over the last twenty years, the proportion of under 40 year olds who own their home has fallen by over a third from 61% to 38% and, in 2014, the Office for National Statistics (ONS) reported that 3.3 million people between the ages of 20 and 34 were still living with their parents (accounting for 26% of the age group).

“The number of first-time buyers since the financial crash of 2007-08, as measured by the number of mortgages issued to first-time buyers, has fallen significantly. Throughout the 1980s and 1990s the number of mortgages to this group averaged over 400,000 per year but between 2008 and 2014 the average annual number of loans has been fewer than 300,000.”

- 1.35 This evidence reflects that set out in the English Housing Survey, which notes that the average age of a first-time buyer in England was 33 in 2016/17, compared to 30 in 2006/07. A total of 60% of first-time buyers were aged between 25 and 34 and 33% were aged 35 and over in 2016/17². Although it would be too simplistic to suggest that the number of young people (and households) can be taken to reflect the need for affordable rent to buy housing in an area, it is likely that the need will be greater in an area with more young adults and where the existing housing supply is oriented towards larger and more expensive properties.
- 1.36 The English Housing Survey indicates that the average (mean) deposit for first-time buyers in England was £48,591 in 2016/17, and two thirds (56%) of first time buyers were earning in the top 40% of all households. This demonstrates that saving for a deposit represents a major barrier to home ownership for many people.

The role of affordable rent to buy in enabling home ownership

- 1.37 Affordable rent to buy housing is likely to be particularly attractive to those aged between 25 and 34, given that the majority of first-time buyers are within this age cohort.
- 1.38 Rentplus noted in December 2018 that their tenants range from 20 to 53 years of age, with the average age being 31. Over two thirds of Rentplus properties accommodate families with children, and 17% households are young couples. The tenure is therefore particularly important in

² English Housing Survey 2016/17, Section 1, Table AT1.8

providing assistance to younger people and families, who are more likely to face barriers in accessing home ownership.

- 1.39 Rentplus reported in December 2018 that the average income of households in Rentplus developments is £31,500. By contrast, the average income for purchasers using the Government's Help to Buy (equity loan) scheme in 2018 Quarters 1 and 2 was £55,500 in England (£54,000 outside of London)³. Analysis conducted in October 2017 in relation to five Rentplus developments⁴ indicated that residents of these developments had average savings of just over £2,000 when they moved into their affordable rent to buy home.
- 1.40 This analysis demonstrates that affordable rent to buy can provide a route to home ownership for households that would not otherwise be able to access their own home on the open market.

³ MHCLG Help to Buy Tables (data to 30 June 2018), Release Table 8

⁴ Lichfields analysis of data provided by Rentplus (October 2017) on Rentplus developments at Palmerston Heights, Plymouth; Corelli Estate, Sherbourne, Dorset; Flanders Close, Bicester; Saxon Fields, Cullompton; and Knighton Road, Wembury. No household savings information is available for the scheme at Moorgate, Lechlade.

2.0 Methodology

PART A: Current situation

Demographic and household profile

- 2.1 An assessment of need for affordable rent to buy housing should commence with an overview of the current situation within the local area in respect of demographic profile, housing stock and market signals. Consideration of existing and projected future population levels and household need and composition provides a baseline through which key pressure points can be identified and drawn out by further research. The key metrics that should be considered are summarised below:

Table 2.1 Demographic and housing profile metrics

Metric	Issues to consider	Data sources
Population by age cohort	<ul style="list-style-type: none"> Total population in local authority Number of persons by age cohort Proportion of total population within different age cohorts 	ONS Mid-Year Population Estimates
Population projections	<ul style="list-style-type: none"> Projected level (and proportion) of future population change Projected level (and proportion) of future change in different age cohorts 	ONS Sub National Population Projections
Household composition	<ul style="list-style-type: none"> Profile of households by type (e.g. single person, couple, family with dependent children, family with non-dependent children, other) Profile of households by age of head of household 	2011 Census data
Household occupancy	<ul style="list-style-type: none"> Level of over and under-occupancy of housing within local authority (defined in terms of number of spare bedrooms within property) 	2011 Census data
Projected household growth	<ul style="list-style-type: none"> Projected number of additional households expected in next 20-25 years Projected change in household composition (age and occupancy structure) 	ONS Household projections

Housing stock

- 2.2 The current stock of housing will influence the ability of newly forming households to access a suitable property. Indicators such as the overall housing stock, number of new completions, and the size, type and average cost of housing will all be relevant and should be considered by way of background to the assessment of need for affordable rent to buy housing. The key metrics that should be considered are summarised below:

Table 2.2 Housing stock metrics

Metric	Issues to consider	Data sources
Dwelling stock	<ul style="list-style-type: none"> Number of houses in local authority 	MHCLG Live Tables 100 and 253

Metric	Issues to consider	Data sources
	<ul style="list-style-type: none"> Number of recent housing completions 	Local Authority Annual Monitoring Report
Housing type and size	<ul style="list-style-type: none"> Profile of dwelling stock (e.g. detached, semi-detached, terraced, flats) Profile of dwelling stock by number of bedrooms and number of habitable rooms 	2011 Census data 2001 Census data (to provide comparison of change over time)
House prices	<ul style="list-style-type: none"> Median and lower quartile house prices Change in house prices over time Median and lower quartile house prices per type of dwelling 	HM Land Registry Data ONS House Price Statistics for Small Areas
Sales turnover	<ul style="list-style-type: none"> Number of transactions in local authority by year and type of dwellings 	HM Land Registry Data
Affordability	<ul style="list-style-type: none"> Ratio of median income to median house prices 	ONS ratio of house price to workplace-based earnings data
Rental levels	<ul style="list-style-type: none"> Average rental value for different house sizes 	VOA Private Market Rental Statistics

2.3 This analysis will provide an overview of the housing market at the local authority level that forms the context for the assessment of need for affordable rent to buy housing. It will highlight any pressure points in the housing market, for example whether overall housing completions are keeping up with housing need, and whether there are particular challenges with affordability of homes to purchase or to rent.

2.4 In addition, the outputs from this analysis in relation to house prices, affordability and rental levels will feed in directly to the assessment of affordable rent to buy outlined below.

PART B: Assessment of need for affordable rent to buy

2.5 An assessment of the need for affordable rent to buy homes should be undertaken as part of an assessment of need for all types of affordable housing. The assessment should be performed at a local authority level, in order to align with the standard method and overall assessment of need for affordable housing.

2.6 This updated methodology prepared by Lichfields takes account of the changes to the NPPF and PPG, whereby affordable rent to buy homes are now included in the NPPF definition of affordable housing. It follows the process outlined in the PPG, which considers the need for affordable homes arising from both current households in need and from newly-forming households. It then combines these two sources of need to indicate the total gross need. The final step in the process is to subtract the existing available accommodation of this type in order to identify the total net need to be addressed.

Step 1: Starting point

Current households in rented/rent-free accommodation

2.7 The starting point in assessing the level of need arising from current households is to identify the total number of households living in the rented sector and in rent-free accommodation (typically living with family), i.e. those that are not home owners.

2.8 The total number of current households in the local authority area should be identified from the ONS Household Projections, using the publication applied by the standard method. At the point

of writing this is the 2016-based Household Projections. However, if the proposed changes to the standard method are taken forward (see Planning Policy Context section above), the 2014-based Household Projections should be used.

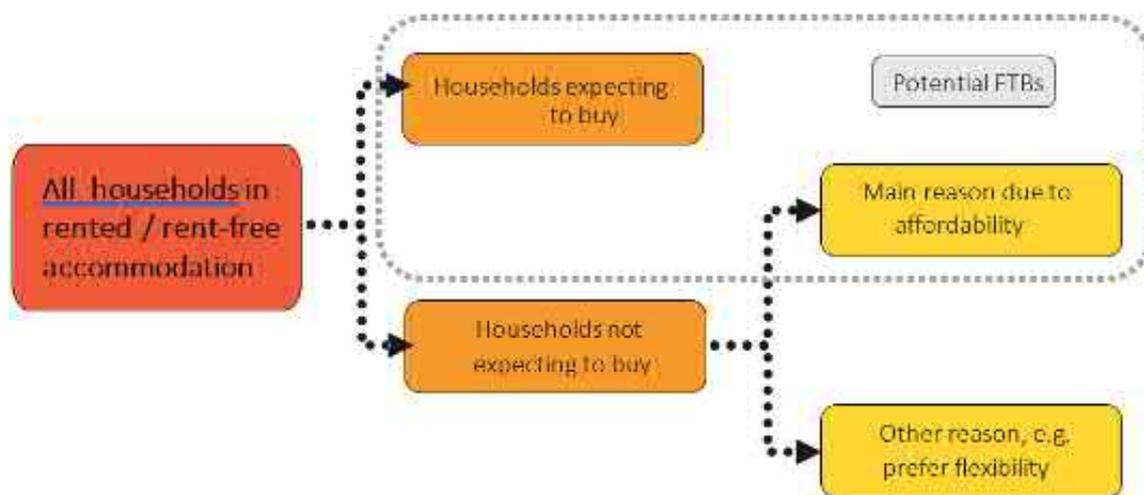
- 2.9 The proportion of these households that are living in rented or rent-free accommodation should be identified from 2011 Census data and then applied to the current number of households in the area.

Aspiration for home ownership

- 2.10 Not all households in the private rented sector necessarily want to move into home ownership (either at all, or in the near future). Some households may not want to move into ownership due to not having secure employment or income, not wanting to be in debt, concern regarding the cost of repairs and maintenance, not wanting the commitment/preferring the flexibility of renting, and liking their current accommodation.
- 2.11 The English Housing Survey states that, in 2016-17, 46% of all renters expected to buy a property at some point in the future and 54% expected not to buy – although for some, this might be due to a view that they might not be able to afford to buy a home, rather than because they do not want to do so.
- 2.12 A separate English Housing Survey report on future home owners (2015/16) provides information on the main reason why households do not expect to buy. A total of 65% of households in rented accommodation stated that their main reason for not expecting to buy was that they do not believe they would ever be able to afford it⁵.
- 2.13 Based on this information, we can estimate the number of households which may be expected to buy if the affordability barrier were removed, i.e. those that aspire to home ownership:
- 1 The percentage of households in a group who would be expected to buy anyway (as shown above); plus
 - 2 The percentage of households which currently do not expect to buy, mainly due to affordability reasons.
- 2.14 This is illustrated in **Error! Reference source not found.** The remaining households are those which cited reasons other than affordability for preferring not to become home owners.

⁵ English Housing Survey 2015/16 Future Home Owners: Annex Table 1.29 – Main reason people don't expect to buy a home, by tenure, 2008/09 to 2015/16

Figure 3 Potential first-time buyer households if affordability barrier removed



Source: Lichfields, based on English Housing Survey

Newly-forming households

- 2.15 The starting point in assessing the level of need arising from newly-forming households is the total number of new households expected to form over the relevant period. This figure will be:
- 1 The level of household growth underlying the housing requirement figure where adopted strategic policies are less than five years old; or,
 - 2 The level of household growth underlying the standard method housing need figure where strategic policies are more than five years old (i.e. the relevant household projections).

Step 2: Households able to afford open market housing

- 2.16 Affordable rent to buy housing is aimed at households that are unable to purchase a home on the open market. Those that are already able to buy an open market property should not be included in the assessed need for this tenure. Therefore, it is necessary to identify the number of current and newly-forming households in this category in order that they can be removed from the need figure.

Identify median house price

- 2.17 Whilst the PPG details the process for assessing the number of households specifically in need of affordable housing, there is no standardised approach for assessing the number of households that can afford to access property on the open market.
- 2.18 One of the tests for affordable housing need is to set household income against lower quartile house prices (Reference ID: 2a-24-20180913). However, it should not be assumed that all households with the necessary incomes to support the purchase of a lower quartile priced home will be able or willing to do so. There is a general correlation between house prices and sizes, the implication of which is that the cheapest properties that might be within the reach of those on lower incomes may be too small to meet the needs of some households (e.g. those with families), and many will require refurbishment, which a large proportion of first-time buyers may be unable to finance or unwilling to undertake.
- 2.19 In the light of this, for an affordable rent to buy assessment, it is more appropriate to assess the ability of a first-time buyer household to purchase a property on the open market against the

median house price for the area. Median house prices can be identified from ONS's ratio of house price to workplace-based earnings data.

- 2.20 This approach in testing affordability against median house prices is also consistent with the standard method, which applies an affordability ratio based on median workplace-based earnings and median house prices⁶.

Identify gross household income required for open market purchase

- 2.21 This stage undertakes an affordability test to identify the number of households that are able to purchase a home on the open market at the median price for the local authority area. In order to identify the income required to access such properties, it is necessary to consider how much households can afford to spend on their housing.
- 2.22 Single-earner households can typically borrow up to 4 times their annual income and dual-earner households can borrow up to 4.5 times their annual income when buying housing⁷.
- 2.23 Using an average income multiple, it is possible to calculate the gross household income required to support the purchase of a property at the median house price identified above.

Gross household income distribution analysis (open market purchase)

Current households

- 2.24 In order to calculate the number of current households in rented/rent-free accommodation that are in receipt of the minimum gross household income identified above, it is necessary to analyse the gross income distribution for households in the relevant local authority area.
- 2.25 Local authority-level data on household incomes is not currently available as open data. This data can be purchased from companies such as CACI or Experian. However, if this is not possible, regional-level data can be applied from the ONS data set, "Effects of taxes and benefits on household income".
- 2.26 Given that no data is readily available that breaks down household income by tenure it is necessary to assume that the household incomes of current households in rented/rent-free accommodation reflects the incomes of all current households. It is noted that, in practice, incomes for those in rented accommodation are likely to be lower than those for home owners. This assumption would therefore serve to overestimate household incomes and therefore the number of households that are assessed as able to afford open market housing. Consequently, it will result in a conservative estimate of the level of need for affordable rent to buy homes.

Newly-forming households

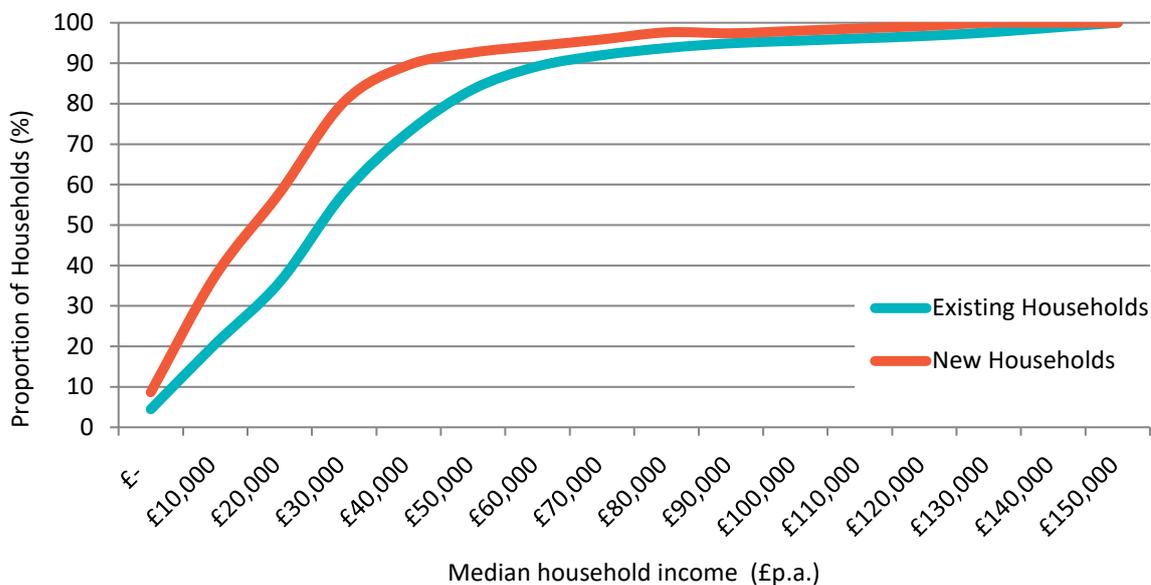
- 2.27 It is important to note that the income distribution of newly-forming households is different to that for all households, with earnings approximately 33% below those for existing households⁸. Therefore, the gross household income distribution identified above for current households should be adjusted for the newly-forming households group. This can be illustrated on a graph that shows the proportion of new and existing households earning different amounts. An example graph is shown below.

⁶ ONS median workplace-based affordability ratios

⁷ It is acknowledged that the methods by which lenders now determine borrowing limits is more complex than simply using mortgage multipliers – lenders take into account a wide range of factors including length of mortgage (which can now be up to 35-40 years), committed expenditure and loan-to-value ratio which can affect the amount borrowed relative to income. However for the purposes of this assessment it is necessary to make some assumptions, and the use of a 4-4.5 income multiplier is considered reasonable for first-time buyers with around a 15% deposit

⁸ This comes from the 2004/05 English Housing Survey published in October 2006. This data is no longer collated but represents a buoyant point in the economy, there is no newer evidence and there is nothing to suggest that the situation for newly forming households has improved.

Figure 4 Affordability modelling



Source: Experian income data, Rightmove, VOA and Lichfields analysis

Remove households able to purchase open market housing

- 2.28 Following on from the previous steps, it will be possible to identify the proportion of current and newly-forming households that earn enough to afford to purchase a home on the private market and that would therefore not require affordable rent to buy housing.
- 2.29 In the absence of available data on household savings, this methodology assumes that households that are able to afford their own homes on the basis of income are also able to raise the required deposit and have the necessary credit rating required to access mortgage finance. However, we note that, in practice, many of these households do not have enough savings to fund a deposit. It is therefore likely that the actual need for affordable rent to buy housing is higher than that identified by this methodology.
- 2.30 The number of current and newly-forming households in receipt of the required income to be able to afford open market housing should be removed from the total number of current / newly-forming households, in order to focus on the target market for the affordable rent to buy tenure.

Step 3: Rental affordability

- 2.31 Affordable rent to buy housing is not suitable for every household that cannot afford to purchase its own home on the open market, and it does not replace the need for social rented homes, not least because it will be unaffordable for a proportion of households.
- 2.32 The next step in assessing the need for affordable rent to buy is therefore to undertake a rental affordability test. This step identifies the minimum level of household income needed in order to support an affordable rent to buy home.

Identify average annual rent for an affordable rent to buy home

- 2.33 The rent charged on Rentplus homes is set at “80% of the local market rents or the Local Housing Allowance (Housing Benefit) level whichever is the lower” (Rentplus website FAQs). This level of rent can be taken as a proxy across the affordable rent to buy tenure.

- 2.34 In making this assumption, the affordable rent to buy assessment should first identify the annual median market rent for the relevant local authority, using Valuation Office Agency (VOA) Private Rental Market Statistics, and then calculate 80% of this rent. This figure represents the approximate annual rent that could be charged for an affordable rent to buy property in the local area.
- 2.35 For the purposes of the assessment of need, it is more appropriate to apply 80% of the market rent than identifying an average level of Local Housing Allowance (LHA) within a local authority area, given that this allowance varies depending upon the size of the property and the Broad Rental Market Area in which the property is located.

Identify gross household income required for affordable rent to buy

- 2.36 The next step is to calculate the level of household income required in order to access an affordable rent to buy home.
- 2.37 The 2016/17 English Housing Survey found that the national average proportion of gross household income (including state assistance) spent on rent was:
- 1 34.3% for the private rented sector;
 - 2 27.1% for those living in local authority housing; and,
 - 3 28.7% for those living in housing association properties⁹.
- 2.38 Other sources also suggest broad rules of thumb between 25% and 35% of gross income as being the appropriate threshold¹⁰.
- 2.39 The issue of how much households should be expected to pay for their housing as a proportion of their average income has also been considered by two Local Plan Inspectors in recent years.
- 2.40 The Inspector into the East Hampshire Joint Local Plan stated in response to the Council's proposed 30% income threshold, based on data indicating that households are actually spending more than this on rent:
- "... it is not right, in my view, to plan on the basis that it is acceptable for those in need to have their already limited incomes squeezed just so they can live in a decent home (and the need for affordable housing reduced for the purposes of plan making)"¹¹.*
- 2.41 Similarly, the Eastleigh Local Plan Examination Inspector's report states:
- "I see no justification for the Council assuming that more than 30% of income could reasonably be spent on housing. Some households may be forced to do so, but that does not make it a justified approach to assessing need"¹².*
- 2.42 A number of local authorities have sought to argue that a higher proportion (35%) should be applied but it is worth noting that 35% of gross income would represent an even more significant proportion of net income which households actually receive, likely getting close to 50%. In the light of this, and on the basis of the above remarks, it is considered that 30% would be an appropriate starting point upon which to base the assessment of the ability of local people to access the housing market, although the precise figure should be selected on a case-by-case basis, taking account of local affordability issues. Indeed, eligible households may opt to "stretch" themselves to take advantage of the opportunity to secure a home that they will eventually own.

⁹ MHCLG English Housing Survey 2016/17, Annex Table 1.13

¹⁰ Shelter Private Rent Watch Report one: Analysis of local rent levels and affordability (October 2011).

¹¹ East Hampshire Local Plan Joint Core Strategy, Inspector's Report (April 2014), paragraph 17-18

¹² Eastleigh Borough Local Plan, Inspector's Report (February 2015), paragraph 32-33

- 2.43 This threshold should be applied to the annual rent for an affordable rent to buy property in the local authority area in order to identify the gross household income required in order to access an affordable rent to buy home.

Proportion of remaining households able to access affordable rent to buy

Current households

- 2.44 Using the same gross household income data and approach applied in Steps 2 and 3, it is possible to identify the proportion of remaining¹³ current and newly-forming households that are in receipt of the required gross household income required to access an affordable rent to buy home in the relevant local authority area. Any households earning less than this figure (i.e. those likely to be in need of social rented housing) would not be able to afford a rent to buy home and so would not be included within the identified need.

Step 4: Affordable rent to buy eligibility

Remove any newly-forming households earning £80,000 pa or more (or £90,000 in London)

- 2.45 The eligibility criteria for Rentplus homes include the requirement that applicant households are earning less than £80,000 pa or more (or £90,000 or more in London). The principle of this eligibility criterion is considered to be appropriate for all affordable rent to buy homes, given that the tenure is aimed at those households that are in need of financial support in order to access home ownership. Depending upon the location, it is not anticipated that there will be a large number of households that pass Step 3 that would achieve this level of income.
- 2.46 The number of current and newly-forming households earning £80,000 or more (or £90,000 or more in London) should be deducted from the remaining households of each type identified in Step 3.

Step 5: Total (gross) need

- 2.47 This step simply identifies the number of current and newly-forming households that meet the requirements of each of the previous elements of the calculation.
- 2.48 The need from both current and newly-forming households should be combined into a single figure, indicating total (gross) need for affordable rent to buy homes.

Step 6: Supply of affordable rent to buy homes

- 2.49 In accordance with the PPG (Reference ID: 2a-025-20180913), a calculation of affordable housing need should take account of any current and committed supply of housing stock that can be used to accommodate households in need. In this case, providers of affordable rent to buy homes such as Rentplus should be contacted to establish:
- 1 The number of affordable rent to buy homes that are likely to become available (i.e. where the current tenants have not opted to purchase the property); and,
 - 2 Number of vacant properties.
- 2.50 The local authority planning register should also be consulted to identify any committed supply of new affordable rent to buy homes.

¹³ Following the removal of those that can afford open market housing in Step 2

2.51 Given that the affordable rent to buy tenure is relatively new, it is likely that any current and committed supply relating to this tenure will be small.

Step 7: Total (net) need

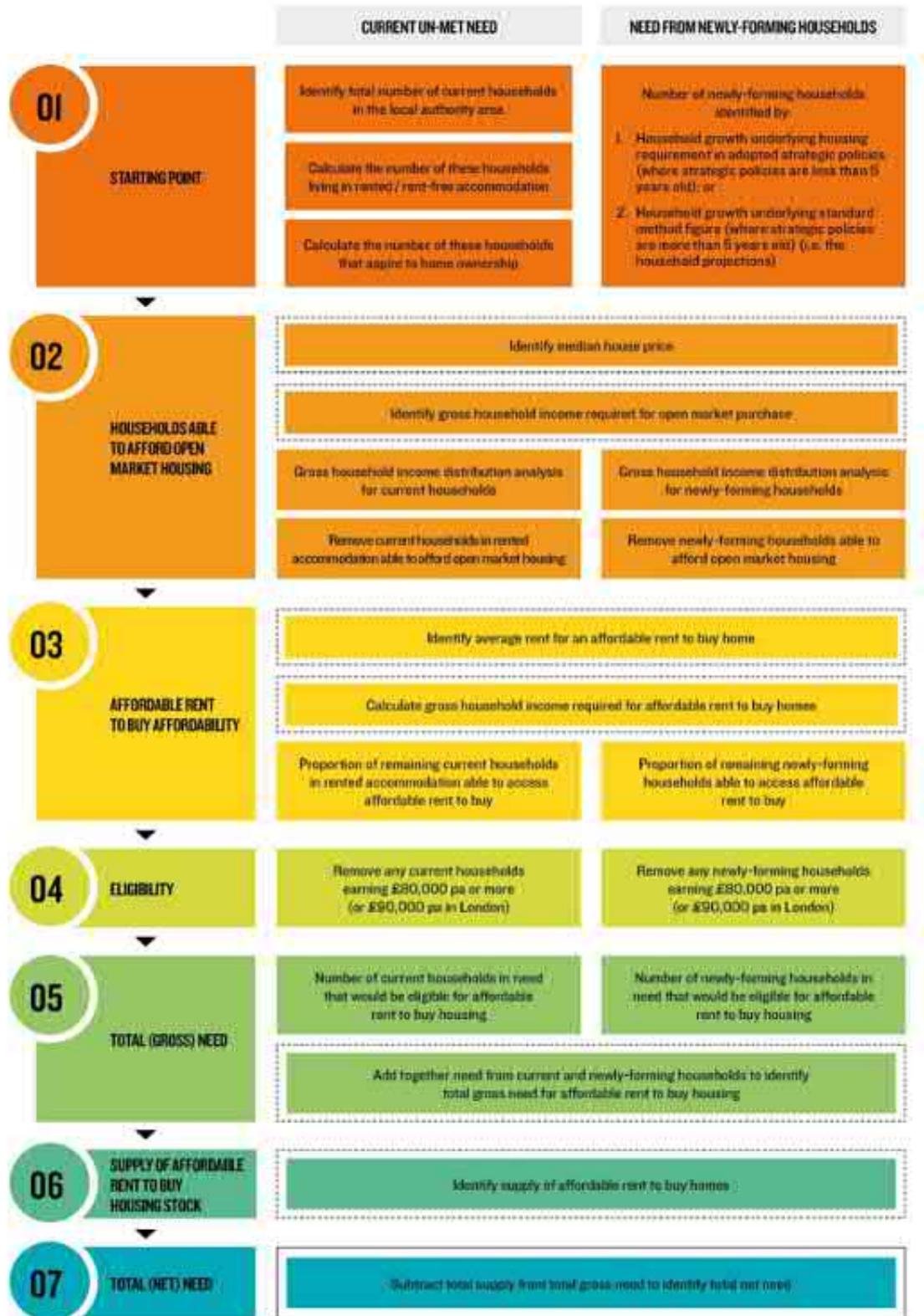
2.52 The total supply of affordable rent to buy homes identified in Step 6 should be subtracted from the total (gross) need to identify total (net) need for this tenure.

Summary

2.53 The approach starts with the number of current households in rented accommodation or living rent-free and the number of newly-forming households in the area. It then identifies the number of current and newly-arising households that can afford to access housing on the open market, and the proportion of households that could not afford an affordable rent to buy property and those that are ineligible for the tenure. The remaining number of households (that can access affordable rent to buy but cannot compete on the open market) represents the total gross need that exists in the local area for an affordable rent to buy property. The available stock of affordable rent to buy homes is then subtracted from this figure to identify the total net need for this tenure.

2.54 Figure 5 provides a summary of the methodology above (which is also provided at Figure 1).

Figure 5 Assessment of need for affordable rent to buy housing



2.55

This calculation can be summarised as follows:

Table 2.3 Assessment of need for affordable rent to buy housing (equation)

Current households in need:	Newly-forming households in need:
Number of current households in rented/rent-free accommodation that aspire to home ownership	Newly-forming households
<i>Minus</i>	<i>minus</i>
Current households in rented/rent-free accommodation that aspire to home ownership that are able to afford open market housing	Newly-forming households able to afford open market housing
<i>minus</i>	<i>minus</i>
Any remaining households in rented/rent-free accommodation that aspire to home ownership unable to access affordable rent to buy	Any remaining newly-forming households unable to access affordable rent to buy
<i>minus</i>	<i>minus</i>
Current households in rented/rent-free accommodation earning £80,000 pa or more (£90,000 in London)	Newly-forming households earning £80,000 pa or more (£90,000 in London)
Total gross need: Current households in need + newly-forming households in need	
<i>Minus</i>	
Supply of affordable rent to buy homes	
<i>Equals</i>	
Total net need: Total gross need - available stock	

3.0 Conclusion

- 3.1 The affordable rent to buy tenure provides an innovative solution to the challenges that face the housing market in this country. By focusing upon aspiring home owners that are currently unable to compete within the open market and unable to save for a mortgage, it provides an alternative to the private rental sector which is characterised by high rents, an insecurity of tenure and below-average living conditions. Crucially, the model also provides an opportunity for households that would not qualify for affordable housing. Accordingly, it provides a response to recognised pressures at a number of points in the system in a way that is not otherwise being provided.
- 3.2 The potential contribution of affordable rent to buy properties can be most effectively understood through a demonstration of the level of need that exists for the product. This report has set out a robust methodological approach to undertake such an assessment of need. This approach draws upon the policy contained within the revised NPPF and guidance set out in the PPG, together with Lichfields' considerable experience in assessing both the overall need for housing and affordable housing. It makes use of readily available data sources and benefits from transparency and clarity.
- 3.3 The demonstration of substantial need for affordable rent to buy properties can form part of the evidence base in support of any planning application for development comprising or including this tenure. This assessment of need can also be supplemented by an explanation of the economic and social benefits of this type of development, which can be very significant to a local area and the people that will benefit from this innovative form of housing tenure.
- 3.4 The methodology can also be applied at the plan preparation stage in identifying the scale of need for this type of housing, which can be supported by housing allocations and appropriate strategic policies.
- 3.5 The assessment of the need for affordable rent to buy housing should be undertaken within the context of the overall need for housing in each local authority area and the need for all types of affordable housing, and should contribute towards meeting these needs. In particular, affordable rent to buy homes are helping to address the specific needs of a given section of the population whose needs are currently not being met by the traditional housing tenures.

Appendix 1: Data sources

Information	Data sources
Population by age cohort	ONS Mid-Year Population Estimates
Population projections	ONS Sub National Population Projections
Household composition	2011 Census data
Household occupancy	2011 Census data
Projected household growth	ONS Household projections
Dwelling stock	MHCLG Live Tables 100 and 253 Local Authority Annual Monitoring Reports
Housing type and size	2011 Census data 2001 Census data (to provide comparison of change over time)
House prices	HM Land Registry Data ONS House Price Statistics for Small Areas ONS ratio of house price to workplace-based earnings data
Sales turnover	HM Land Registry Data
Affordability	ONS ratio of house price to workplace-based earnings data
Rental levels	Valuation Office Agency (VOA) Private Market Rental Statistics
Gross household income distribution	Economic forecasting companies, e.g. Experian ONS Effects of taxes and benefits on household income



THE PLANNING BUREAU FOR McCARTHY & STONE RETIREMENT
LIFESTYLES Ltd and CHURCHILL RETIREMENT LIVING EMAIL RESPONSE – 21
APRIL 2020

From: Alex Child [REDACTED]
Sent: 21 April 2020 11:58
To: List-ForwardPlanning-SBC
Subject: FW: Stafford Local Plan - Issues and Options Consultation

Dear Sirs

I act on behalf of McCarthy & Stone Retirement Lifestyles Ltd and Churchill Retirement Living, which together are the market leaders in the provision of specialised housing for older people for sale. Thank you for allowing us to comment on the Issues and Options and I trust the observations made will be of assistance and acted upon as you progress the local Plan

Questions 1A and 1B. Evidence Base

Whilst the Chapter on viability acknowledges that a Whole Plan Viability Assessment will be undertaken, it is submitted that this needs to be done before the Plan progresses any further. If Viability of Older Persons Housing is to be tested, it should be recognised that this differs markedly from conventional forms of housing and should be assessed accordingly. Given this and that the preferred site for this type of development is a centrally located urban brownfield site, it is submitted that viability testing of an individual proposed development should be at the planning application stage, or at least an indication that this will also be permitted at the planning application stage if viability testing of older persons housing has been carried out at the Plan making stage

Question 3F Key Objectives

The objective for Stafford itself refers to providing accommodation for an ageing population. This needs to be extended to Stone and across all communities given the Papers acknowledgment of an ageing population (Para 2.3 refers to an increase of 35 in the over 65's during the Plan period and the PPG in respect of housing for older and disabled people refers to a "critical" need. Additionally given the level of need, older persons housing and the benefits that it brings should be explored further as a theme

Question 6E A policy for the prevention of the redevelopment of employment land to residential uses

If the Council is to propose such a policy as part of its overall strategy for maintaining sufficient levels of employment land, it should do so with caution and considerable scope to limit it. Considerable emphasis is rightly promoted by the paper on the reuse of well-located urban brownfield sites. Many of these will be in employment use to varying levels of intensity and viability and many may be better used for housing and particularly, older persons housing. If a policy is proposed, it might be criteria led but should be drafted in such a way as to allow a considered and flexible

judgement to be made as to whether or not a proposal is acceptable. It should not be drafted as a negative “hurdles” policy

Question 8A Should the Council encourage the development of brownfield land over greenfield land

Yes. Not just as a matter of sustainability but also and preventing the loss of countryside but also because such sites are the preferred location for older persons housing

Question 8F Is the housing mix schedule sufficient to meet all the housing needs of the community

No. As indicated elsewhere in the paper, the needs of older people should be met for the greater part through specialised housing for older people. This usually means stand alone development of apartments or bungalows, normally of one or two bedrooms with some care or support services. This means that such housing is built in clusters and not spread over the development. It is recommended that a specific plan is included which addresses how the Council is going to deliver on the housing needs of older people and recognising these points both on stand alone brownfield and on appropriate allocations (i.e. where a range of services are to be provided). The Housing Mix policy should then cross reference to this new policy

Question 8H Should there be a policy for 10% wheelchair accessible policy.

Whilst Para 8.24 states that adapted housing is sometimes sufficient in meeting the needs of older people, it does not provide the care, support and community (thereby addressing loneliness and retaining independence) that specialised housing does. There are instances elsewhere where specialised housing is expected to provide higher levels of adaptability. This is perverse as such housing already provides many benefits and high levels of accessibility throughout. Such an approach is equally if not more appropriate for conventional housing developments as an alternative way of presenting housing options for older people . The Council is to be applauded in its approach and should not consider higher requirements for older persons housing – as that is already “delivering” on what older people need

Question 8I Should the Council consider a policy for bungalows to be delivered on all major developments and are there any other measures that the Council should employ to meet the demand for specialist housing

Whilst proposing a requirement for bungalow development is understood, this should be in conjunction with a policy that also delivers on other forms of specialist housing for older people. A policy for bungalows without a policy to deliver on other forms of housing for older people suggests that bungalows better meet needs. This is not necessarily the case for many older people who will look for care, support and community to be built in the development. Any policy for bungalows must be part of a wider policy that possibly allocated but certainly encourages the provision of all forms of bespoke older persons housing in brownfield and greenfield locations

Once more, thank you for allowing the opportunity to comment on the Issues and Options for the Local Plan

Alex Child

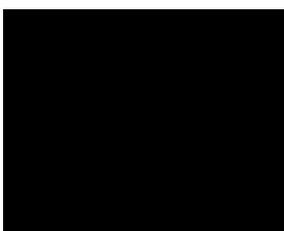
Director, The Planning Bureau

Stafford Borough Local (2020 – 2040)
Issues and Options consultation
Representations on behalf of Vistry Homes
Limited

April 2020

Contents

1.	Introduction	3
2.	The Site and Stafford	4
3.	Introduction	6
4.	Vision and Strategic Objectives	8
5.	Sustainability and Climate Change	10
6.	The Development Strategy	11
7.	Delivering Housing	17
8.	Delivering Quality Environment	21
9.	Environmental Quality	22
10.	Connections	23
11.	Summary	24
	Appendix 1: Site Location Plan	25



21 Apr 2020

1. Introduction

- 1.1 These representations to the Stafford new Local Plan (SNLP) Issues and Options Consultation are made on behalf of Vistry Homes Limited (Vistry Homes), who are promoting land at Marston Farm, Beaconside, Stafford (the site). A site location plan is enclosed at **Appendix 1**. The site represents a sustainable and deliverable residential land opportunity for circa 500 new market and affordable homes and public open space.
- 1.2 As well as responding to these representation, we have completed a call for sites form for the site, confirming that the site can accommodate circa 500 new market and affordable homes and form a strategic extension to the north of Stafford.
- 1.3 These representations are accompanied by the following supporting documents:
- 1.4 Our client has commissioned a series of technical work to be undertaken to build up a detailed understanding of the site and assist in the development of a illustrative masterplan. This information will be submitted in due course to supplement the information provided at this stage in the preparation of the plan.
- 1.5 These representations are structured as follows:
 - **Section 2** looks at the sustainability credentials of Stafford and provides more detail on the site that our Client is promoting for strategic development;
 - **Sections 3 - 10** set out our response to the consultation questions in the Issues and Options Consultation document;
 - **Section 11** sets out our Clients' response to the Call for Sites exercise; and
 - **Section 12** provides a summary of our representations.

2. The Site and Stafford

- 2.1 Vistry Homes is promoting a sustainable opportunity for strategic residential growth to the north west of Stafford. The site has the potential to deliver a residential development of circa 500 houses in a strategic location adjoining the highly sustainable new community proposed on land north of Beaconside, which benefits from a resolution to grant outline planning permission (16/25450/OUT) for the delivery of up to 2,000 dwellings together with a wide range a services and facilities including:
- Two local centres;
 - One health centre;
 - A 60 bed care home; and
 - A two-form and separate five form primary school.
- 2.2 This strategic site will clearly deliver a wide range of benefits both for the new residents of that development, as well as the wider area.
- 2.3 The above ensures that this part of Stafford, where Vistry Homes' site is located, is highly sustainable in its own right, notwithstanding its close proximity to Stafford Town Centre.
- 2.4 Stafford is identified by the adopted local plan as the largest urban area and most sustainable location within the Borough, playing a regionally significant role in providing employment, retail and other services and facilities, including a strong education offer (such as Staffordshire University). It is also served by high frequency railway services to Manchester, Liverpool, Crewe, Birmingham and London.

The site and its surroundings

- 2.5 The site comprises agricultural land. It is bound by Marston Lane to the west, agricultural land to the south and east, and the Marston Farm farmstead to the north. Beyond Marston Farm to the north is the route of HS2 Phase 2a to Crewe.
- 2.6 The site is relatively flat, the western boundary with Marston Lane is lined by a continuous hedge, as is the southern and eastern boundary. There is a line of sporadic trees within the southern extent of the site, otherwise it is open. A public right of way runs across the site, from the south west off Marston Lane to the north east where it meets an agricultural track.
- 2.7 The site is not subject to any local plan designation or any national statutory designation such as a SSSI, SAC, SPA, Ramsar site, AONB and is entirely located within flood zone 1.
- 2.8 Vistry Homes' highways consultant, Stantec, has advised that a suitable access can be achieved off Marston Lane.

Vistry Homes

- 2.9 The Vistry Group was established in January 2020 following the merger of Bovis Homes Limited, Linden Homes and Galliford Try Partnerships. With developments across the United Kingdom Vistry Group will be delivering around 12,000 affordable and market homes a year.
- 2.10 The house building aspect of the business, Vistry Homes (formally Bovis Homes and Linden Homes) is one of the leading house builders across the United Kingdom, and have a nationally recognised reputation for delivering high quality residential developments. Vistry Homes create communities that are successful places to live and homes that residents can be proud of.
- 2.11 The strategic land team at Vistry Homes has a successful track record for promoting sites through the Local Plan preparation process and working in close partnership with Parish Councils, local planning authorities, landowners and the local community to deliver well designed and successful new places.

Representations

- 2.12 Our Client, Vistry Group, welcomes the opportunity to engage with the *Issues and Options Consultation* paper on the New Local Plan for Stafford (NLP). We have structured our response to reflect the individual chapters set out within the Issues and Options consultation document, as set out below:
- Section 3: *Introduction*
 - Section 4: *Vision and Strategic Objectives*
 - Section 5: *Sustainability and Climate Change*
 - Section 6: *The Development Strategy*
 - Section 7: *Delivering Housing*
 - Section 8: *Delivering Quality Environment*
 - Section 9: *Environmental Quality*
 - Section 10: *Connections*

3. Introduction

Question 1.A

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

AND

Question 1.B

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

3.1 Paragraph 1.10 (on page 12) of the consultation document rightly identifies that the evidence base is evolving and so the list at Table 1 may be incomplete. It does omit some key evidence base studies which will be necessary to underpin the emerging plan and justify the Council's eventual approach to meeting its housing needs between 2020 and 2040. These are summarised below:

- **Viability assessment** – the purpose of viability assessment is not to compromise sustainable development but to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan¹. A proportionate assessment will therefore be critical to evidencing the plan's affordable housing requirement and justifying any infrastructure to be delivered by development and secured via Section 106 agreements.
- **Open space assessment** – the indoor sport facilities and playing pitch strategy report does not appear to take into account public open space, such as play grounds (including LEAPs, MUGAs etc.) and the Council's open space, sport and recreation assessment was published in 2013 so is now out of date. This evidence is necessary to underpin the requirement for open space in new development so that everyone has access to a network of high quality open spaces (as per NPPF paragraph 96).
- **Climate change and renewables evidence** – in response to Q4.3 we identify that evidence will be necessary if the Council is to impose requirements for renewable energy provision in new development above and beyond national policy requirements. The previous study, completed in 2010, is now out of date, climate change policy has moved on significantly since then.
- **Landscape capacity assessment or equivalent** – the most recent assessment of Stafford's landscape was published in 2001. Since then significant development has occurred across Safford Borough. A fresh assessment is therefore necessary to fully understand the characteristics of the Borough's landscape and to inform its capacity for new development, as recognised by the PPG².

¹ PPG Paragraph: 001 Reference ID: 10-011-20190509

² PPG Paragraph: 037 Reference ID: 8-037-20190721

- **Transport study** – the PPG³ is clear that “...it is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and / or review of that plan”. This evidence will then assist in informing opportunities for encouraging a shift to more sustainable transport usage and infrastructure spending.
- **Infrastructure Delivery Plan** – It is welcomed that the Council is considering this report currently. This will need to be informed by a number of the assessments identified above.

³ PPG Paragraph: 001 Reference ID: 54-001-20141010

4. Vision and Strategic Objectives

Question 3.A

Do you agree that the Vision should change?

AND

Question 3.B

Do you agree the Vision should be shorter?

AND

Question 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?

- 4.1 A vision should be concise and provide a blue print for what the plan will deliver to meet the needs of the Borough. The vision as drafted is too long and as such loses its effectiveness. The new plan should therefore comprise a much shorter and positive vision, which should set out what the Borough will look like in 2040. This should include what the borough will look like, what facilities should be delivered and what it will be like to live and work in, and the Council's priorities and actions for meeting their housing and economic needs. It must be specific, measurable, attainable and realistic.
- 4.2 In any case, the vision reflects outdated national planning policy (it was adopted under the 2012 NPPF, which has now been replaced). Also, as we discuss in response to Q5.F, the Council intends to significantly change the spatial strategy compared with that in the adopted plan. The vision will need to be updated reflect this.

Question 3.D

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

AND

Question 3.E

Is the overall number of objectives about right?

AND

Question 3.F

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

- 4.3 The objectives should be a combination of spatially based objectives and then more topic specific objectives, such as climate change, healthy lifestyles, the natural environment, tourism and the built environment. Spatially based objectives are important in a Borough like Stafford given there are significant differences between its settlements, indeed Stafford is more than four times the size of the next largest town, Stone. Similarly to the vision, the objectives must be specific, measureable, attainable and realistic.

5. Sustainability and Climate Change

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?

- 5.1 Vistry Group recognise that climate change is a significant issue which local authorities must respond to through plan making and decision taking, especially as Stafford declared a climate emergency in July 2019.
- 5.2 The Government recently held a consultation on 'The Future Homes Standard' as part of their wider target to bring all greenhouse gas emissions to net zero by 2050. This consultation recognised that both existing and future homes account for 20% of total emissions and accordingly sought to identify a series of new efficiency standards for new housing to meet. As well as committing to the introduction of the Future Homes Standard by 2025, the Government consultation also identified a number of possible ways in which homes built to these new standards could have significantly less emissions than those built to current energy efficiency requirements (Approved Document L 2013).
- 5.3 Within The Future Homes Standard Consultation document the Government clarified the relationship between plan making and the existing Part L Building Regulations / the emerging Future Homes Standard; noting that there 'may be no need for local authorities to seek higher standards'. Vistry Group contend that with the development of such substantial energy efficiency standards, the SNLP should not seek to develop additional plan specific requirements as their application could cause confusion and replication of both the emerging 2020 Part L requirements and The Future Homes Standard.
- 5.4 Notwithstanding the above, should the council introduce any renewable energy or climate change policy, it must be robustly tested through a viability assessment, prepared during the plan making stage, and the policy itself must be supported by proportionate evidence, with clear guidance on how the policy will relate and be applied in light of The Future Homes Standard.

6. The Development Strategy

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?

- 6.1 No, Policy SP1 does not reflect the NPPF published in 2019, it was prepared in the context of the 2012 iteration of the NPPF. In any case, it is not necessary to retain the policy, which essentially replicates national planning policy.
- 6.2 Rather than repeating the NPPF, PPG clearly states⁴ that recognising the favour of sustainable development is better achieved by identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally. Indeed it goes on to state that *"there is no need for a plan to directly replicate the wording in paragraph 11 in a policy"*.

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?

- 6.3 The Council's dismissal of figures that fail to meet the minimum housing need implied by the standard method is strongly supported, and consistent with national policy which emphasises that only *'exceptional circumstances'* – that are agreed to have not been proven in Stafford – would justify such an approach (NPPF paragraph 60).
- 6.4 Furthermore, even the cited outcome of the standard method for Stafford (408dpa) appears unrepresentative of the full need and demand for housing when applying the most basic of the checks required by the PPG, based on past housing delivery⁵. The borough has delivered an average of 579 dwellings per annum over the past eight years⁶ (2011-19) which is some 42% higher than the minimum need now implied by the method. The national reforms which led to the introduction of the standard method were not intended to encourage authorities to scale back their contribution towards boosting housing supply, and the significantly lower minimum need now implied for Stafford must therefore – in accordance with the PPG – be considered in the context of a continued national commitment to significantly boosting the rate of housing delivery.
- 6.5 Where it is acknowledged that there is an existing higher demand for housing than the calculated minimum need, this naturally strengthens the merits of the higher growth scenarios identified by the Council (D-G). These scenarios each aim to support varying levels of job growth, albeit the lowest of these – Scenario D – would similarly lead to a

⁴ PPG Paragraph: 036 Reference ID: 61-036-20190723

⁵ PPG Reference ID 2a-010-20190220

⁶ Lichfields (2020) Stafford Borough Council Economic and Housing Development Needs Assessment, Table 10.8

fall in the recent rate of housing delivery and should therefore be discounted again where it is recognised that it would not support the boosting of supply.

- 6.6 The remaining housing need scenarios (E-G) positively aim either to support planned regeneration, sustain the historic rate of job growth or deliver a boost to job growth beyond a baseline forecast. Such aims are consistent with the positive planning expected by the NPPF – and indeed the Government’s wider strategy of spreading economic prosperity throughout the UK – and would proactively ensure that housing does not act as a barrier to local economic growth and business investment in Stafford⁷. The PPG clearly accepts that changing economic circumstances can justify planning for a higher level of housing need than the standard method suggests⁸, confirming that planning for levels of housing provision aligned to these scenarios would be in conformity with the NPPF as well as ensuring a positive plan-led approach for the borough.
- 6.7 In considering the amount of housing required to support such growth, and in direct response to question (b), the allowance for a “Partial Catch Up” is considered to be justified and necessary, as notably concluded in the Council’s evidence base⁹. Failure to make such an allowance would simply accept that younger people in Stafford will face continued difficulties in accessing the housing needed to form independent households, a key symptom of the acknowledged national housing crisis. This clearly is not the intended outcome of the Government’s planning policies. The application of a positive adjustment of this nature, which allows for increased younger household formation beyond past trends, is critical in ensuring that an adequate amount of land and homes are provided for during the plan period to ensure this issue is addressed.
- 6.8 On the basis of the above, it is considered that a requirement for **between 597 and 746 dwellings per annum** would be justified, allowing for a “Partial Catch Up” under housing need Scenario E, F or G. The Council should, however, keep its position under constant review, mindful of the Government’s recent commitment to *‘introduce a new approach’* for calculating local housing need in the coming months *‘which...makes sure the country is planning for the delivery of 300,000 new homes a year’*¹⁰. This is likely to be in place when the Council next consults on Preferred Options in January 2021 and must therefore be taken into account.

⁷ MHCLG (2019) National Planning Policy Framework, paragraphs 35, 80 and 81a/c; HM Government (2017) Industrial Strategy: building a Britain fit for the future

⁸ PPG Reference ID 2a-010-20190220

⁹ Lichfields (2020) Stafford Borough Council Economic and Housing Development Needs Assessment, paragraph 10.34

¹⁰ MHCLG (2020) Planning for the Future, paragraph 10 third bullet

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.

6.9 In accordance with NPPF Paragraph 65, the plan should clearly establish a housing requirement figure for the whole area which shows the extent to which the identified housing need can be met over the plan period. The plan should then separately identify completions and adopted allocations / commitments which can then be deducted in a separate policy to identify the residual housing need to be met through allocations and policies in the plan over the plan period.

Question 5.D

i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?

6.10 The Settlement Assessment and Associated Profiles Paper (SAAP) identifies Stafford as the largest urban area with a regionally significant service centre role providing employment, retail and other facilities, and a key driver for growth in the region. The population of the Town (65,716) further highlights the strategic importance of Stafford within the Borough with Stone (the proposed second tier settlement and second largest urban area within the borough) having a population of only 16,385.

6.11 We agree that the SAAP and the supporting commentary within the Interim Sustainability Appraisal (SA) (January 2020) provide a robust basis for the preparation of the settlement hierarchy which will guide development within the NLP. The SAAP recognises the inherent sustainability credentials of Stafford and its regional significance, this underpins Stafford's importance and why it should continue to be a strategic location for significant growth in the emerging plan. Furthermore additional housing will assist in maintaining its service provision.

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

6.12 As we set out in response to Q 5.B, the cited outcome of the standard method for Stafford (408dpa) appears unrepresentative of the full need and demand for housing when applying the most basic of the checks required by the PPG, based on past housing delivery. The borough has delivered an average of 579 dwellings per annum over the past eight years (2011-19) which is some 42% higher than the minimum need now implied by the method. The national reforms which led to the introduction of the standard method were not intended to encourage authorities to scale back their contribution towards boosting housing supply, and the significantly lower minimum

need now implied for Stafford must therefore – in accordance with the PPG – be considered in the context of a continued national commitment to significantly boosting the rate of housing delivery.

- 6.13 In our response to Question 5.D we highlighted that the SAAP identifies Stafford as the largest urban area in the Borough, it has a regionally significant service centre role providing employment and is critical for driving growth in the region, it also has good retail and other facilities. There is no other settlement in the Borough which offers similar facilities and services, they are all much smaller.
- 6.14 As per our response to Q 5.G below, we do not object to the principle of the overall spatial strategy including a new garden community or sustainable urban extension, this will relieve pressure for further growth in Stafford's smaller settlements. This however must be balanced with growth at sites of circa 500 dwellings or less (such as Vistry Homes' site at Marston Farm) given the length of time it takes for construction to commence on large sites (as we discuss further below in response to Q 5.G). Furthermore it is likely sites of a garden community or sustainable urban extension scale will continue to deliver housing beyond the end of the plan period.
- 6.15 Stafford is clearly capable of accommodating further growth given its scale, accessibility and service provision (as much is recognised in the Council's own evidence – the SAAP), it is therefore inconceivable that any strategy would not include significant residential growth around the town. This is recognised by Sustainability Appraisal (SA), option 3 (which would see the majority of development directed to Stafford) performs the best overall, scoring significant positive effects across the greatest number of objectives.

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.

- 6.16 Further to our responses set out above to Questions 5.B and 5.F, we support the Council in identifying a spatial strategy which will allocate housing in excess of the standard methodology (408 dwellings per annum). Such an approach will assist in significantly boosting the supply of homes and the creation of sustainable development.
- 6.17 Whilst we have no objections to a new Garden Community or Major Urban Extension forming part of the overall spatial strategy, they take much longer to deliver their first dwelling, indeed Lichfields' recent Start to Finish second edition report (February 2020) demonstrates that large sites (more than circa 500 dwellings) on average take a minimum of five years from validation of an outline planning application to construction of the first dwelling. They will therefore make minimum, if no contribution to the Council's five year housing land supply on adoption, and most likely will be delivering housing beyond the emerging NLP plan period.

6.18 If Stafford is to maintain a five year housing any strategy which includes a new Garden Community or Major Urban Expansion must therefore carefully balance this with smaller sites (up to circa 500 dwellings) which are capable of early delivery given they are unlikely to have significant upfront infrastructure requirements before the first dwelling can be delivered. They also tend to be controlled by a single party (such as Vistry Homes' site at Marston Farm), so there is no delay whilst equalisation matters are resolved.

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)?

AND

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

6.19 We agree that Options 3 and 5 are the only NPPF-compliant growth options. These are the only options which are capable of meeting Stafford's emerging housing needs. The other four options are not capable of meeting the full need, or would require significant development in unsustainable locations, so would be contrary to the NPPF. This is because they both include growth around Stafford, the Borough's largest settlement. To not do so would not represent a sustainable approach. This is recognised by the plan's SA, the option which scores the best (Option 3) comprises significant growth being accommodated around Stafford.

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.

6.20 Before considering its preferred option the Council must establish its starting point, i.e. the total housing need the NLP will need to deliver over the emerging plan period (including whether a 'Partial Catch Up' is appropriate). Once the housing need has

been established, the Council can then consider which spatial strategy will deliver the full need in the most sustainable way.

- 6.21 How much housing the new plan must identify will have to deduct any remaining delivery from the current plan period given there will be a cross over between 2020 and 2031.
- 6.22 Whether a Garden Community forms part of the preferred strategy depends on deliverability and whether it is the most appropriate strategy when considered against all reasonable alternatives (NPPF paragraph 35).

Question 5.0

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

- 6.23 Vistry Group's site at Marston Farm is assessed in Strafford's most recent SHELAA (2019) (site ref: MAR04) as available and achievable for 398 dwellings. In terms of suitability the site is assessed as 'being adjacent to a sustainable settlement identified in the adopted Local Plan'.
- 6.24 This was previously promoted by the landowner. It is now fully controlled by Vistry Homes, a national PLC housebuilder. Their initial assessment of the site is that it is capable of delivering circa 500 dwellings. A site specific evidence base is now being prepared to explore its capacity further and demonstrate to the Council that it represents a significant and sustainable opportunity to meet some of the borough's emerging housing needs.
- 6.25 We have submitted a call for sites form to provide updated information in respect to the site.

7. Delivering Housing

Question 8.A

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

- 7.1 There is no objection to the Council encouraging brownfield development first, indeed NPPF paragraph 137 (a) seeks to make as much use as possible of suitable brownfield sites and underutilised land.
- 7.2 It must however be acknowledged that Stafford Borough is a predominantly rural authority with limited brownfield land available for development. The Council's Brownfield Land Register (2019) identifies 44 individual brownfield sites with a potential yield of circa 800 net dwellings, the majority of which already benefit from outline or full planning permission. There are no significant sites identified which have the potential to be allocations in the emerging NLP. It is therefore more likely that brownfield land will contribute to the supply as windfall development, rather than specific allocations in the plan.

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?

AND

Question 8.C

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

- 7.3 In a district as diverse as Stafford, we do not consider that a standardised 'blanket' approach to density is appropriate and could prevent developments from making optimal use of the potential of each site.
- 7.4 Option ii would allow for the Council to identify suitable densities reflective of the diverse range of settlements within the District and optimise the use of land within the borough. In accordance with NPPF paragraph 123, this approach would allow the Council to identify minimum density standards for town centres and other locations that are well served by public transport (such as Stafford and Stone) whilst not impacting upon the deliverability or viability of settlements within the wider borough where a blanket density threshold would not be suitable.

- 7.5 Should the NLP seek to introduce minimum density thresholds across the borough, it must be underpinned by relevant and up-to-date evidence which is adequate and proportionate as set out in our response to question 1.A/B.

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?

- 7.6 While it is appreciated that the table includes a 'recommended range', we consider that the housing mix should be able to respond directly to local and up to date evidenced housing need.
- 7.7 Housing mix is driven by market demand and so a rigid housing mix policy would not provide the flexibility to adapt nor endure for the plan period. In turn this could impact upon the viability for sites to come forward as well as their attractiveness to house builders and home buyers.
- 7.8 Should the NLP seek to introduce a policy which identifies a set housing mix across the borough, it must be underpinned by relevant and up-to-date evidence which is adequate and proportionate as set out in our response to question 1.A/B.

Question 8.H

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

- 7.9 A rigid policy requiring 10% of affordable homes delivered to be wheelchair accessible is not necessary.
- 7.10 Such a requirement would require these properties to be delivered in accordance with Part M4(3) of the Building Regulations which again could impact upon the viability for sites to come forward and would essentially be a blanket approach which might not necessarily relate to any identified needs.
- 7.11 Instead we would consider that, where the housing register identifies the specific need for such properties, then the Council should seek to work with developers to meet the need through emerging proposals.
- 7.12 Should the NLP seek to introduce a policy to require 10% of affordable homes delivered on new major development sites to be wheelchair accessible, it must be underpinned by relevant and up-to-date evidence which is adequate and proportionate as set out in our response to question 1.A/B.

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?

7.13 As we have set out in response to Question 8.F, we consider that the detailed mix of housing to be delivered on sites throughout the district should be driven by local evidence on a site by site basis. This will allow for a site to be respond to the individual character of an area without impacting upon the viability of the proposed development or indeed its attractiveness to house builders and home buyers.

Question 8.K

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

7.14 As per our response to Question 5.B, we consider that the delivery of between 252 and 389 affordable dwellings per annum is only achievable if the Council take a proactive and positive approach throughout the plan period to significantly boosting the supply of housing in line with NPPF paragraph 59. This approach would need to ensure that a sufficient amount and variety of land can come forward where it is needed, throughout the plan period and in location which meets the identified needs of groups with specific housing requirements.

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?

7.15 The Council should provide a robust assessment of demand for self-build plots to justify the necessity for this provision.

7.16 As set out in NPPF paragraph 31, 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. The Council's Self & Custom Build Register alone is not a sound basis for setting a specific policy requirement and as set out in the PPG, the Council should provide a robust assessment of demand including an assessment and review of data held on the Council's Register¹¹, which should be supported by additional data from secondary sources to understand and consider

¹¹ NPPG Ref: ID 2a-017-20192020

future need for this type of housing¹². At present such evidence has not been prepared and should the Council wish to proceed with such an approach suitable evidence must be provided as set out in our response to Question 1.B.

- 7.17 Notwithstanding the above, we do not consider that the council should burden developers with the responsibility for the delivery of self and custom build plots. Such an approach is contrary to national guidance, which outlines that the Council should themselves engage with landowners and encourage them to consider self & custom build. Furthermore, such an approach could impact upon the overall delivery of housing throughout the plan period as well as potentially impacting upon the viability of housing developments.
- 7.18 We therefore consider that 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. Should the Council seek to go further than that, then as set out in response to Question 1.B, it must be underpinned by relevant and up-to-date evidence which is adequate and proportionate.

¹² NPPG Ref: ID 57-0011-20160401

8. Delivering Quality Environment

Question 9.L

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

a. Require complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision?

b. To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc.

c. Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough.

8.1 The NPPF states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve (Para 124), noting that Plans should set a clear vision and design expectations.

8.2 While it is acknowledged that Design Review Panels can assist in developing the design of complex or sites of a significant strategic scale such as garden villages, not all 'large scale development' should be required to be subject to a design review panel. The Design Review Panel process can materially slow down the design process and often in relation to residential developments, discussions and amendments to the proposed design in outline planning applications, can often become lost or 'dumbed down' through the subsequent reserved matters submissions.

8.3 The Planning Advisory Service is currently reviewing the role of Design Review Panels. This will be an important piece of evidence in determining whether to use the panels and when to use them.

8.4 In any case, the NPPF specifically references tools such as the Building For Life assessment for ensuring high quality design, the Council should seek to utilise and commit to delivering nationally prescribed design standards. These standards are widely used by the planning industry to deliver high quality design in new development.

9. Environmental Quality

Question 10.A

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

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

9.1 As made clear from the outset, Vistry Homes is supportive of measures to ensure development is sustainable and responds to climate change. Any measures however must be evidenced and subject to viability assessment. This evidence does not currently exist, and it is not clear whether the Council intends to undertake it. Without it these measures cannot be justified.

10. Connections

Question 12.A

Do you agree with the general approach to delivering sustainable transport for Stafford Borough through the new Local Plan? If not please give a reason for your response

- 10.1 We agree with this approach and consider that the new Local Plan should seek to direct development to the most sustainable locations within the Borough, such as Stafford which is the largest settlement with the best connectivity and access to services.
- 10.2 By directing development to the most sustainable locations within the district where there are already good quality services and facilities and jobs, it will assist in the uptake of sustainable transport means and active travel.
- 10.3 As set out above, the Council should undertake transport evidence to inform their approach sustainable transport.

Question 12.B

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

- 10.4 The provision of high quality public open space within new development should be a key consideration in the development of illustrative masterplan and detailed design proposals. The Council should undertake transport evidence as part of the preparation of this plan to inform walking and cycling provision further.

Question 12.D

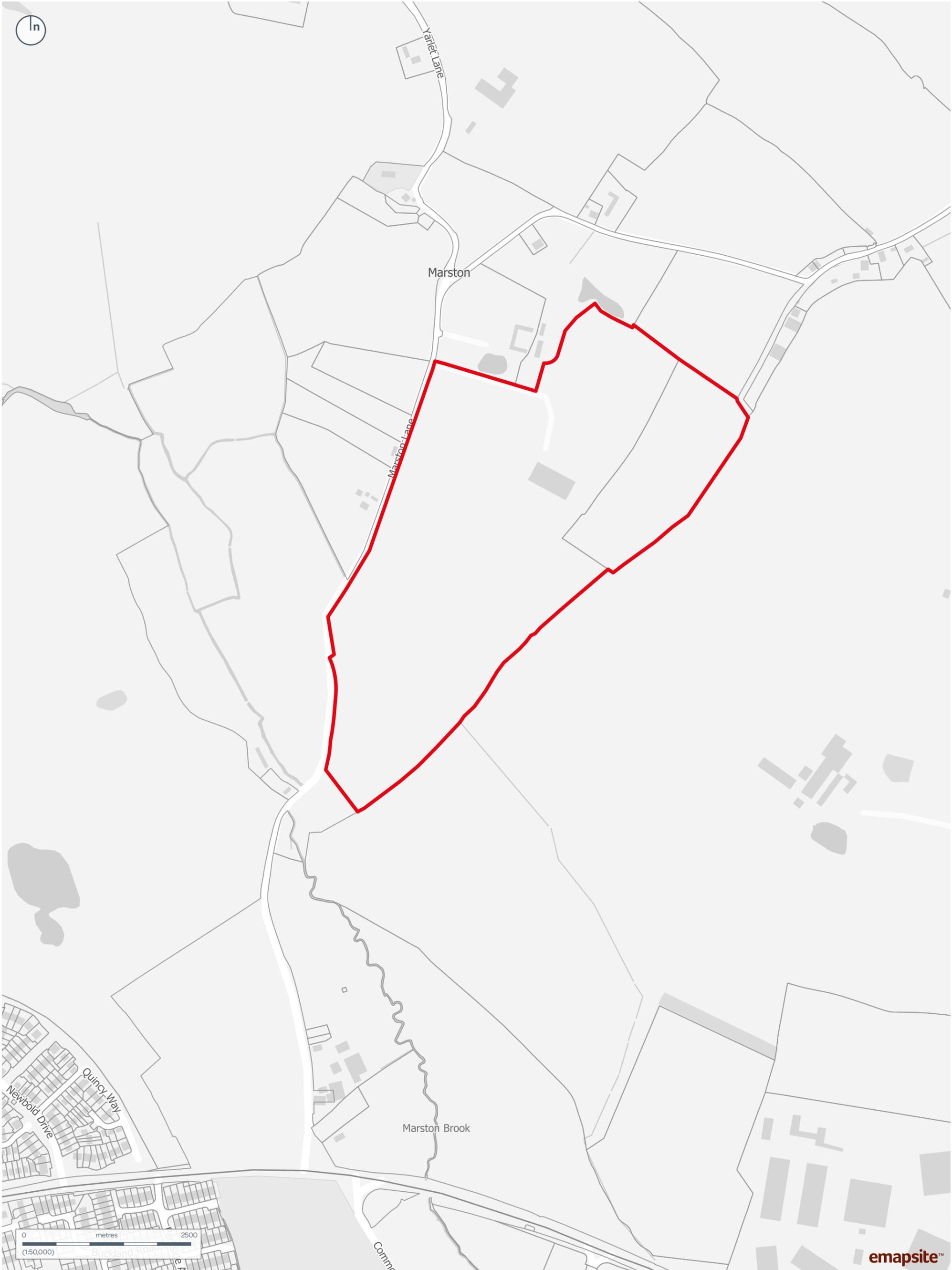
a) Do you consider it is necessary to set local parking standards for residential and non-residential development?

- 10.5 The setting of any local car parking standards should accord with NPPF paragraphs 105 and 106, to ensure that new developments provide suitable space within the development to meet the needs of new residents. It is important that sufficient parking provision is made, preventing cars from being parked in locations which are not suitable for parking and causing a nuisance. We also consider that alongside the consideration of local parking standards, the Council should be mindful of how the parking can be delivered so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

11. Summary

- 11.1 As set out in these representations Vistry Homes is promoting a sustainable opportunity for strategic residential opportunity to the north west of Stafford, at Marston Farm.
- 11.2 Stafford is the most sustainable location within the Borough, it has a wide range of services and facilities, significant employment and educational opportunities, and exceptional accessibility, all within close distance of Vistry Homes' site. It would be perverse to not include substantial new growth at and around Stafford in any future spatial strategy for meeting the Borough's emerging housing needs. As much is clear from the evidence base, including the Sustainability Appraisal.
- 11.3 Vistry Homes' site at Marston Farm, on the edge of Stafford, is capable of contributing to the emerging housing needs in a sustainable location. A number of technical reports have been commissioned to demonstrate this and the site's ability to deliver new market and affordable home, and real benefits for the community, whilst having a minimal impact on the environment.
- 11.4 We trust the information provided within these representations will be considered and we welcome the opportunity to promote Vistry Homes' site at Marston Farm, to the north west of Stafford through the New Local Plan.

Appendix 1: Site Location Plan



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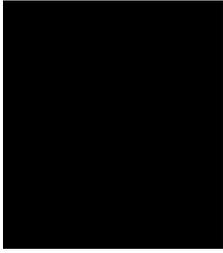
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 Site Boundary

CLIENT Vistry Homes Limited
PROJECT Land at Marston Farm, Stafford (VISQ3000)
DRAWING: Site Location Plan

PROJECT NO. VISQ3000	STATUS Final
DRAWING NO. 10_	SCALE 1:5000 @ A3
REVISION 00	DATE April 2020
	CHECKED BY ID



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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	C/O Agent	Mr
First Name		David
Surname		Fovargue
E-mail address		
Job title (if applicable)		Technical Director (Planning)
Organisation (if applicable)	Bellway Homes Ltd and John Alison Land & Research	Wood
Address		
Postcode		
Telephone Number		

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

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

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

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

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

Please note:

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

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

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name		Organisation		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	<u>1.A & 1.B</u>	Other
2. Please set out your comments below				
<p>Question 1.A Is the evidence that is being gathered a suitable and complete list? And Question 1.B Have any key pieces of evidence necessary for Stafford Borough’s new Local Plan been omitted?</p> <p>A housing needs assessment is needed for the Large Settlements to inform an evidence-based distribution of development, to ensure that market and affordable housing needs can be met, the viability local services and facilities supported and new infrastructure investment secured (via CIL/S106). This evidence would sit alongside the Settlement Assessment and SHELAA to help ensure a robust and justified approach to securing a sustainable spatial strategy (i.e. directing growth to where it is needed, where it is sustainable and where there are deliverable sites).</p> <p>The Council’s suggestion that the levels of growth to be directed to particular Large Settlements should now be suppressed if they have taken a greater share during the previous plan period is arbitrary, unsound and is not NPPF-compliant. The reason a Large Settlement has delivered in the past is no doubt due to allocations being made or permissions granted given the sustainability of the location and the availability of suitable, achievable and deliverable sites (see for example the valuable role that Eccleshall has played over the adopted plan period to date). To discount such highly sustainable locations would not constitute a positively prepared, forward-looking plan for next 20 years.</p>				

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

Question 3.D Should the spatially-based approach to the objectives be retained? Does this spatially-based approach lead to duplication? and 3.E Is the overall number of objectives about right?

Key Objective 21 (page 29) directing only 'small-scale' housing development to areas outside of Stafford and Stone is not justified and is unsound. The amount of development directed to Large Settlements should be based on evidence of local needs, the role and function of settlements (Settlement Assessment) and capacity of deliverable sites linked to the SHELAA (see also response to Q1A).

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	<u>4.A</u>	Other	

2. Please set out your comments below

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 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?

Climate change mitigation should be considered in the round and in the context of a sustainable spatial strategy (e.g. focused on the most sustainable settlements with services, facilities and public transport to all help reduce the need to travel by car), as well as what energy-related measures can be incorporated within specific developments and buildings. Ensuring a sustainable spatial strategy is where the new plan can play its most significant role in reducing CO₂ emissions and mitigating future climate change. With respect to the energy performance of specific development and buildings, building regulations are the most effective way of addressing this – providing consistency and certainty at a national level: this is why the NPPF and NPPG require plans to align with national building regulations, and that any policies do not exceed levels commensurate with Code for Sustainable Homes Level 4 (NPPF150b and NPPG012 [ID 6-012-20190315]). It is also important to note that building regulations are currently undergoing review as part of the Future Homes Standard, so any local plan policy could quickly become out-of-date.

If specific policies are proposed, then regard will need to be had to NPPF34 and ensuring that the cumulative impacts of such policies and other policies in the new Local Plan are assessed as part of the viability assessment (NPPF34, NPPF35 and NPPG001 Reference ID: 10-001-20190509): "...policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land."

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	<u>4.C</u>	Other	

2. Please set out your comments below

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?

Given the direction of travel with the Future Homes Standard, which will all underpin changes to building regulations, and include measures for both energy efficiency (fabric first) and on-site renewable/low carbon energy generation, a specific local plan policy requirement is unlikely to be necessary and could soon become out-of-date (see also response to Q4B).

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	<u>5.B</u>	Other	

2. Please set out your comments below

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?

The Annual Housing Requirement should be at least 408 dpa since this aligns with Local Housing Need (LHN) / Standard Method required under NPPF60. There are no exceptional circumstances justifying a plan which proposes lower levels of growth (i.e. scenarios B & C).

However, the evidence demonstrates that Stafford Borough is capable of planning for much more, which would link with the ‘pro-growth’ agenda (including HS2), NPPF approach to boost the supply of homes and the principles of NPPG 010 (Reference ID: 2a-010-20190220) which allows for LPAs to plan for more than the LHN. For example, the Council’s 2019 AMR shows that the Council has achieved average annual completion rates of 604dpa 2011-2019, including an average 857dpa over the past 5 years.

Furthermore, duty to cooperate discussions should take place with Birmingham City Council and its immediately adjoining authorities regarding the ability to help address unmet needs associated with the Greater Birmingham HMA, particularly given the presence of Green Belt constraints surrounding the city’s boundaries. Stafford Borough could play an even greater role in supporting delivery of new homes for this part of the sub-region reflecting its recent track record in the provision of new homes.

On this basis, scenarios E and F are supported in the context of considering future preferred options.

Question 5.B b) Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

Yes, this approach is supported and an example of a positively prepared plan, helping to boost the supply of homes in accordance with the NPPF. We consider that this would align with NPPG 010 (Reference ID: 2a-010-20190220) which allows for LPAs to plan for more than the LHN.

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	<u>5.C</u>	Other
2. Please set out your comments below				
<p>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.</p> <p>No discount is justified because the new local plan is forward-looking to the next 20 years. In doing so, the deliverability, lead-in times and contribution from all extant allocations will need to be tested as part of the plan-making process to ensure that they are soundly based, deliverable and capable of being carried forward into the new plan. If they are carried forward and considered 'sound' then they would form part of the housing trajectory anyway, so a discount is also unnecessary.</p>				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	<u>5.D</u>	Other
2. Please set out your comments below				
<p>Question 5.D Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy? Do you agree that the smaller settlements should be included in the Settlement Hierarchy?</p> <p>We agree with the basis for preparing such a key piece of evidence but wish to highlight the following:</p> <ul style="list-style-type: none"> • This evidence needs to sit alongside an assessment of local housing needs at the Large Settlements (an assessment which needs to be undertaken) and the findings of the SHELAA to help inform what levels of development should be directed to Large Settlements as part of a sustainable spatial strategy (see also response to Q1A & 3D). • There is no justification for the split between Tier 3 and Tier 4 settlements (for example, no evidence is included to compare the number of services and facilities in the Northern Urban Areas (Tier 3) with those of the Large Settlements (Tier 4) in section 7.1 of the assessment). These tiers can easily be consolidated as a single 'Tier 3'. • With respect to the specific conclusions for the Large Settlement of Eccleshall, where my client has land interests (refer Figure 1, enclosed – Land south of Stone Road, east of Eccleshall), this is invaluable in showing the extensive range of services and facilities when compared with other settlements. Eccleshall is clearly one of the best performing Large Settlements as the second largest of those identified (by number of dwellings). However, it is also important that the Settlement Assessment is updated to reflect the hourly bus service (route 14) to Stone and Stafford which is currently missing, as should the significance of Eccleshall containing one of the Borough’s key local retail centres. 				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
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Section		Paragraph		Table	
Figure		Question	<u>5.G</u>	Other	

2. Please set out your comments below

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 agree with the conclusions of Figure 5.1 (page 52) which highlights the challenges with such an approach, not least the fact that such schemes “may not be close to existing high quality transport corridors” [by which we assume those served by public transport], that “A New Settlement would take a long time to be delivered” and the considerable infrastructure investment that is required. In the context of boosting the supply of homes, ensuring a deliverable supply of sites and maintaining supply over the plan period (NPPF67 & NPPF73) such an approach should be treated with caution and any contribution certainly limited in the first 10 years of the plan.

To ensure a positively prepared and sound plan the Council should focus on those sustainable settlements capable of delivering new homes, employment land and local infrastructure investment, enhancing what is already there (public transport, jobs, schools and other community facilities) rather than starting afresh in isolated and unsustainable locations. This will be a more effective and deliverable strategy insofar as any preferred option is concerned.

The Large Settlement of Eccleshall, for example, is clearly on the largest and best performing settlements of this scale in the Borough and has played a key contribution in the delivery of new market and affordable homes in the plan period to date, a role which should clearly continue as part of the new plan for 2020-2040. Eccleshall also has available, suitable and achievable sites, including my client’s 6.8ha south of Stone Road / East of Eccleshall, a deliverable site in the SHELAA (site ref ECC02) (refer Figure 1, enclosed, for a site location plan). Further details on the opportunities associated with this site will follow in due course.

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	<u>5.H</u>	Other	

2. Please set out your comments below

Question 5.H i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)? ii) If you do not agree what is your reason? iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.

We disagree. Greater articulation of the spatial options is required to understand what levels of growth are planned and where with respect to specific settlements - and shown on a series of plans - in order to test (SA/SEA) and consult on these options. At this stage it is unclear as to what these options will mean for named settlements, for example to the Large Settlement of Eccleshall.

Furthermore, we support Growth Option 2 and disagree that this would not be NPPF-compliant. The rejection of Growth Option 2 appears driven by a desire to downplay or suppress the levels of future development taking place at the Large Settlements, locations which are both sustainable and have a track record of helping meet local housing needs in Stafford Borough. To attempt to dismiss the contribution of such sustainable settlements as part of a forward-looking plan for the next 20 years cannot be considered sound.

The Large Settlement of Eccleshall, for example, is clearly one of the largest and best performing settlements of this scale in the Borough and has played a key contribution in the delivery of new market and affordable homes in the adopted plan period to date, a role which should clearly continue as part of the new plan for 2020-2040. Eccleshall also has available, suitable and achievable sites, including my client's 6.8ha south of Stone Road / East of Eccleshall, a deliverable site in the SHELAA (site ref ECC02) (refer Figure 1, enclosed, for a site location plan). Further details on the opportunities associated with this site will follow in due course.

On this basis we object to Growth Option 3 since it appears to signal a limitation on future development to Large Settlements which have supported housing delivery in the past. This approach cannot be justified. We object to Growth Option 5 on the same basis – the implication for specific Large Settlements being uncertain at this stage.

We support the view that Growth Option 4 should be discounted as not NPPF-compliant. This is not a reasonable alternative since a sole reliance on Garden Communities will constrain the delivery of new homes. Likewise, we support the rejection of Growth Option 1 since focusing solely on Stafford and Stone completely disregards the wider Borough.

The principle of Growth Option 6 (clusters iii & v) is supported subject to understanding what this means for specific named Large Settlements such as Eccleshall.

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	<u>5.I</u>	Other	

2. Please set out your comments below

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.

See response to Q5G.

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation

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<p>Question 5.J What combination of the four factors: Growth Option Scenario (A, D, E, F, G); Partial Catch Up, Discount / No Discount, No Garden Community / Garden Community Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process?</p> <p>A combination of Growth Option E/F, including partial catch-up with no discount, centered on a strategy more closely aligned with Growth Option 2 (i.e. recognizing the significant role and contribution of highly sustainable Large Settlements such as Eccleshall) should be pursued. Any proposals for a Garden Community should form part of the latter part of the plan period (i.e. 10-15 years) given the range of issues the Council has raised in the consultation documents.</p>				

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For such a policy to be considered, evidence of needs and viability testing is required (cumulative assessment encompassing other policy requirements) to ensure the policy soundly based and accords with the NPPF and NPPG (NPPF34, NPPF35 supported by NPPG 001 Reference ID: 10-001-20190509:).

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Figure		Question	<u>8.N</u>	Other	

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Question 8.N **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? Should the council allocate plots for the purpose of self-build throughout the borough?**

For such a policy to be considered, evidence of needs and viability testing is required (cumulative assessment encompassing other policy requirements) to ensure the policy soundly based and accords with the NPPF and NPPG (NPPF34, NPPF35 supported by NPPG 001 Reference ID: 10-001-20190509:).

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Section		Paragraph		Table	
Figure		Question	<u>9.F</u>	Other	

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Question 9.F Should the Council consider a policy requiring that new developments take an active role in securing new food growing spaces? Yes / No. Please explain your answer. If yes, are the following measures appropriate? **Protecting and enhancing allotments, community gardens and woodland; Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites; Requiring major residential developments to incorporate edible planting and growing spaces; Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities.**

For such a policy to be considered, evidence of needs and viability testing is required (cumulative assessment encompassing other policy requirements) to ensure the policy soundly based and accords with the NPPF and NPPG (NPPF34, NPPF35 supported by NPPG 001 Reference ID: 10-001-20190509:).

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Section		Paragraph		Table	
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Any specific policy will need to align with the requirements of NPPF185, 187 and 188.

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Section		Paragraph		Table	
Figure		Question	<u>9.M</u>	Other	

2. Please set out your comments below

Question 9.M Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?

Such designations are unlikely to be necessary. However, should such an approach be pursued it will need to reflect the three tests in NPPF100.

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	<u>10.C</u>	Other	

2. Please set out your comments below

Question 10.C The currently adopted Plan for Stafford Borough makes reference to waste management in Policy N2. However, the growing population of Stafford Borough and the need for further action to combat climate change suggests the employment of further, more stringent measures encouraging sustainable waste disposal is desirable. Therefore, should the council; **Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site? Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development? Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford Borough?**

Further detail is required. Nevertheless, for such a policy to be considered, evidence of needs and viability testing is required (cumulative assessment encompassing other policy requirements) to ensure the policy soundly based and accords with the NPPF and NPPG (NPPF34, NPPF35 supported by NPPG 001 Reference ID: 10-001-20190509:)

Please use a continuation sheet if necessary

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

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

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

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

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

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

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

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

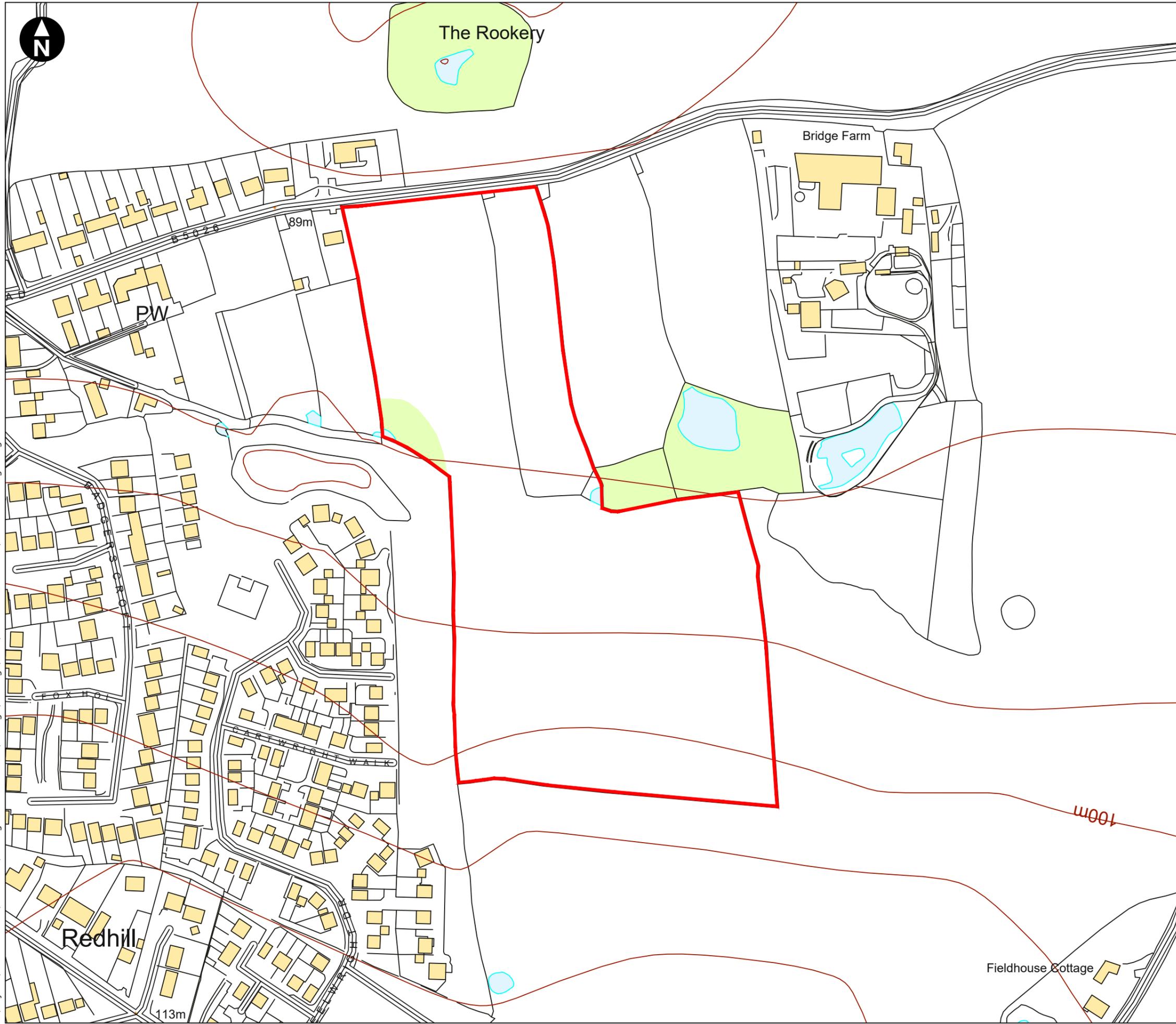
Comments cannot be treated as confidential. Your personal information, such as your postal and email address will not be published and signatures will be redacted, but your

name and organisation will be made available. We will only use your personal information to send you information on the New Local Plan and associated planning policy matters.

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

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

H:\Projects\40995 SE Bristol, Bath Road, Strategic Land Promotion\5 Design\Drawings\Acad\Stone Road Eccleshall\40995-Lea17.dwg Originator: VICKI.SMITH



Key
Site boundary (6.78 ha)

0 m 150 m
Scale 1:2500 @ A3

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Stafford Local Plan 2020-2040
Issues & Options

Figure 1
Land south of B5026 Stone Road,
East of Eccleshall

April 2020

Stafford Local Plan 2020-2040: Issues & Options (April 2020)

Representations on behalf of Bellway Homes Ltd and John Alison Land & Research

Question 1.A Is the evidence that is being gathered a suitable and complete list? And Question 1.B Have any key pieces of evidence necessary for Stafford Borough's new Local Plan been omitted?

A housing needs assessment is needed for the Large Settlements to inform an evidence-based distribution of development, to ensure that market and affordable housing needs can be met, the viability local services and facilities supported and new infrastructure investment secured (via CIL/S106). This evidence would sit alongside the Settlement Assessment and SHELAA to help ensure a robust and justified approach to securing a sustainable spatial strategy (i.e. directing growth to where it is needed, where it is sustainable and where there are deliverable sites).

The Council's suggestion that the levels of growth to be directed to particular Large Settlements should now be suppressed if they have taken a greater share during the previous plan period is arbitrary, unsound and is not NPPF-compliant. The reason a Large Settlement has delivered in the past is no doubt due to allocations being made or permissions granted given the sustainability of the location and the availability of suitable, achievable and deliverable sites (see for example the valuable role that Eccleshall has played over the adopted plan period to date). To discount such highly sustainable locations would not constitute a positively prepared, forward-looking plan for next 20 years.

Question 3.D Should the spatially-based approach to the objectives be retained? Does this spatially-based approach lead to duplication? and 3.E Is the overall number of objectives about right?

Key Objective 21 (page 29) directing only 'small-scale' housing development to areas outside of Stafford and Stone is not justified and is unsound. The amount of development directed to Large Settlements should be based on evidence of local needs, the role and function of settlements (Settlement Assessment) and capacity of deliverable sites linked to the SHELAA (see also response to Q1A).

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 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?

Climate change mitigation should be considered in the round and in the context of a sustainable spatial strategy (e.g. focused on the most sustainable settlements with services, facilities and public transport to all

help reduce the need to travel by car), as well as what energy-related measures can be incorporated within specific developments and buildings. Ensuring a sustainable spatial strategy is where the new plan can play its most significant role in reducing CO₂ emissions and mitigating future climate change. With respect to the energy performance of specific development and buildings, building regulations are the most effective way of addressing this – providing consistency and certainty at a national level: this is why the NPPF and NPPG require plans to align with national building regulations, and that any policies do not exceed levels commensurate with Code for Sustainable Homes Level 4 (NPPF150b and NPPG012 [ID 6-012-20190315]). It is also important to note that building regulations are currently undergoing review as part of the Future Homes Standard, so any local plan policy could quickly become out-of-date.

If specific policies are proposed, then regard will need to be had to NPPF34 and ensuring that the cumulative impacts of such policies and other policies in the new Local Plan are assessed as part of the viability assessment (NPPF34, NPPF35 and NPPG001 Reference ID: 10-001-20190509): *“...policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. Policy requirements should be clear so that they can be accurately accounted for in the price paid for land.”*

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?

Given the direction of travel with the Future Homes Standard, which will all underpin changes to building regulations, and include measures for both energy efficiency (fabric first) and on-site renewable/low carbon energy generation, a specific local plan policy requirement is unlikely to be necessary and could soon become out-of-date (see also response to Q4B).

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?

The Annual Housing Requirement should be *at least* 408 dpa since this aligns with Local Housing Need (LHN) / Standard Method required under NPPF60. There are no exceptional circumstances justifying a plan which proposes lower levels of growth (i.e. scenarios B & C).

However, the evidence demonstrates that Stafford Borough is capable of planning for much more, which would link with the ‘pro-growth’ agenda (including HS2), NPPF approach to boost the supply of homes and the principles of NPPG 010 (Reference ID: 2a-010-20190220) which allows for LPAs to plan for more than the LHN. For example, the Council’s 2019 AMR shows that the Council has achieved average annual completion rates of 604dpa 2011-2019, including an average 857dpa over the past 5 years.

Furthermore, duty to cooperate discussions should take place with Birmingham City Council and its immediately adjoining authorities regarding the ability to help address unmet needs associated with the Greater Birmingham HMA, particularly given the presence of Green Belt constraints surrounding the city’s boundaries. Stafford Borough could play an even greater role in supporting delivery of new homes for this part of the sub-region reflecting its recent track record in the provision of new homes.

On this basis, scenarios E and F are supported in the context of considering future preferred options.

Question 5.B b) Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?

Yes, this approach is supported and an example of a positively prepared plan, helping to boost the supply of homes in accordance with the NPPF. We consider that this would align with NPPG 010 (Reference ID: 2a-010-20190220) which allows for LPAs to plan for more than the LHN.

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.

No discount is justified because the new local plan is forward-looking to the next 20 years. In doing so, the deliverability, lead-in times and contribution from all extant allocations will need to be tested as part of the plan-making process to ensure that they are soundly based, deliverable and capable of being carried forward into the new plan. If they are carried forward and considered 'sound' then they would form part of the housing trajectory anyway, so a discount is also unnecessary.

Question 5.D Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy? Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

We agree with the basis for preparing such a key piece of evidence but wish to highlight the following:

- This evidence needs to sit alongside an assessment of local housing needs at the Large Settlements (an assessment which needs to be undertaken) and the findings of the SHELAA to help inform what levels of development should be directed to Large Settlements as part of a sustainable spatial strategy (see also response to Q1A & 3D).
- There is no justification for the split between Tier 3 and Tier 4 settlements (for example, no evidence is included to compare the number of services and facilities in the Northern Urban Areas (Tier 3) with those of the Large Settlements (Tier 4) in section 7.1 of the assessment). These tiers can easily be consolidated as a single 'Tier 3'.
- With respect to the specific conclusions for the Large Settlement of Eccleshall, where my client has land interests (refer Figure 1, enclosed – Land south of Stone Road, east of Eccleshall), this is invaluable in showing the extensive range of services and facilities when compared with other settlements. Eccleshall is clearly one of the best performing Large Settlements as the second largest of those identified (by number of dwellings). However, it is also important that the Settlement Assessment is updated to reflect the hourly bus service (route 14) to Stone and Stafford which is currently missing, as should the significance of Eccleshall containing one of the Borough's key local retail centres.

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 agree with the conclusions of Figure 5.1 (page 52) which highlights the challenges with such an approach, not least the fact that such schemes *"may not be close to existing high quality transport corridors"*

[by which we assume those served by public transport], that “A New Settlement would take a long time to be delivered” and the considerable infrastructure investment that is required. In the context of boosting the supply of homes, ensuring a deliverable supply of sites and maintaining supply over the plan period (NPPF67 & NPPF73) such an approach should be treated with caution and any contribution certainly limited in the first 10 years of the plan.

To ensure a positively prepared and sound plan the Council should focus on those sustainable settlements capable of delivering new homes, employment land and local infrastructure investment, enhancing what is already there (public transport, jobs, schools and other community facilities) rather than starting afresh in isolated and unsustainable locations. This will be a more effective and deliverable strategy insofar as any preferred option is concerned.

The Large Settlement of Eccleshall, for example, is clearly on the largest and best performing settlements of this scale in the Borough and has played a key contribution in the delivery of new market and affordable homes in the plan period to date, a role which should clearly continue as part of the new plan for 2020-2040. Eccleshall also has available, suitable and achievable sites, including my client’s 6.8ha south of Stone Road / East of Eccleshall, a deliverable site in the SHELAA (site ref ECC02) (refer Figure 1, enclosed, for a site location plan). Further details on the opportunities associated with this site will follow in due course.

Question 5.H i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)? ii) If you do not agree what is your reason? iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.

We disagree. Greater articulation of the spatial options is required to understand what levels of growth are planned and where with respect to specific settlements - and shown on a series of plans - in order to test (SA/SEA) and consult on these options. At this stage it is unclear as to what these options will mean for named settlements, for example to the Large Settlement of Eccleshall.

Furthermore, we support Growth Option 2 and disagree that this would not be NPPF-compliant. The rejection of Growth Option 2 appears driven by a desire to downplay or suppress the levels of future development taking place at the Large Settlements, locations which are both sustainable and have a track record of helping meet local housing needs in Stafford Borough. To attempt to dismiss the contribution of such sustainable settlements as part of a forward-looking plan for the next 20 years cannot be considered sound.

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Question 9.M Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?

Such designations are unlikely to be necessary. However, should such an approach be pursued it will need to reflect the three tests in NPPF100.

Question 10.C The currently adopted Plan for Stafford Borough makes reference to waste management in Policy N2. However, the growing population of Stafford Borough and the need for further action to combat climate change suggests the employment of further, more stringent measures encouraging sustainable waste disposal is desirable. Therefore, should the council; Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site? Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development? Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford Borough?

Further detail is required. Nevertheless, for such a policy to be considered, evidence of needs and viability testing is required (cumulative assessment encompassing other policy requirements) to ensure the policy soundly based and accords with the NPPF and NPPG (NPPF34, NPPF35 supported by NPPG 001 Reference ID: 10-001-20190509:)

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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Ms	Mr
First Name	N	B
Surname	Wassall	Edgecombe
E-mail address		
Job title (if applicable)		
Organisation (if applicable)		YES Planning
Address		
Postcode		
Telephone Number		

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

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

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

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

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

Please note:

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

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

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name		Organisation YES Planning		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	1	Paragraph		Table
Figure		Question	1.A	Other
2. Please set out your comments below				
<p>No.</p> <p>In relation to flooding the Strategic Flood Risk Assessment is at a very high level and does not necessarily capture regular flooding that disrupts local communities e.g. Mill Lane in Great Haywood.</p> <p>The SFRA should consider strategies to deal with these regular events and where possible link these to proposed development that could mitigate these important local issues.</p>				

1B

No. In relation to flooding the Strategic Flood Risk Assessment is at a very high level and does not necessarily capture regular flooding that disrupts local communities e.g. Mill Lane in Great Haywood.

The SFRA should consider strategies to deal with these regular events and where possible link these to proposed development that could mitigate these important local issues.

3A

Yes.

However, not with the concept of garden villages in green fields for future rural development.

New development in rural areas should relate to existing communities with an aim of enhancing existing communities and providing housing opportunities for young people and those wanting to downsize in their existing communities.

New rural community development should go hand in hand with delivery improved services e.g. superfast broadband, to existing rural communities and where relevant, improving existing issues e.g. local flooding.

3B

Yes

3C

Yes.

However, the cost of development applications needs to be considered. The vision needs to be supported via a shared data base of information to reduce application costs with each development effectively having to reproduce very similar reports. In local areas there should be an SBC accepted position on some issues eg flooding and ecology.

3D

In relation to rural development, this should not be as tightly constrained and strictly limited to Key Service Villages.

Consideration should be given to development based on local needs and benefits that they may provide.

Organic growth of existing communities, including smaller villages, should be seen as the preferred sustainable way forward. The definition of sustainability should be considered in context to the needs of small communities.

The new garden village concept is not the way forward as it consumes open countryside, requires significant new infrastructure which will, as a consequence, divert resources from existing communities that are in need of infrastructure upgrades.

Given the likely severe economic forecast, resources for infrastructure investment are to be even more stretched for decades to come.

By supporting new garden villages, SBC will, by default, abandon existing communities in terms of further investment and in particular, the young people that live there as there will be no prospect of affordable housing in their existing communities.

4A

a). No, the Building Regulations are adequate to set required standards.

b). In terms of building construction, national requirements should be adequate.

4B

All options should be considered by the Borough

4C

Renewable options should be considered at a strategic level to support the entire Borough not just individual developments. Private schemes run the risk of failure through lack of maintenance and ongoing commitment/incentive.

4D

Yes

4E

No, the Building Regulations are adequate to set required standards.

5D

1 Yes

ii Yes

5F

a) Yes

b) The new garden village concept is not the way forward as it consumes open countryside, requires significant new infrastructure which will, as a consequence, divert resources from existing communities that are in need of infrastructure upgrades.

Given the likely severe economic forecast, resources for infrastructure investment are to be even more stretched for decades to come.

By supporting new garden villages, SBC will, by default, abandon existing communities in terms of further investment and in particular, the young people that live there as there will be no prospect of affordable housing in their existing communities.

c) All but garden communities for the reasons noted above.

5G

No, for the reasons noted above.

5H

i) No.

ii) Growth option 3 is recommended. New garden communities are not supported for the reasons noted.

5I

No.

The new garden village concept is not the way forward as it consumes open countryside, requires significant new infrastructure which will, as a consequence, divert resources from existing communities that are in need of infrastructure upgrades.

Given the likely severe economic forecast, resources for infrastructure investment are to be even more stretched for decades to come.

By supporting new garden villages, SBC will, by default, abandon existing communities in terms of further investment and in particular, the young people that live there as there will be no prospect of affordable housing in their existing communities.

5J

Garden communities should not be supported for the reasons noted above.

5P

Some form of infill/ organic growth should be permitted for all settlements

5Q

Settlement boundaries should allow perimeter infill to sensible features rather than being tightly constrained to prohibit smaller developments.

8A

Whilst brownfield land should be utilized as a priority, it should be for employment rather than more housing.

8B

No

Each development should be considered on its own merits.

8C

No

Each development should be considered on its own merits.

8D

Yes

8E

a) Yes, but an open mind to consider case by case situations for conversions with existing constraints.

8H

Yes. Perhaps this should apply to all new houses i.e. they should have key features that will allow a future conversion if required.

8I

A Yes, or ground floor flats.

B There could be an argument to reduce garden area for bungalows/ground floor flats.

C Yes

8L

No

8N

A Yes

B Yes

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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Mr	Mr
First Name	Matthew	Stephen
Surname	Weaver	Locke
E-mail address		
Job title (if applicable)		Planning Consultant
Organisation (if applicable)		c/o Hinson Parry & Co
Address		
Postcode		
Telephone Number		

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

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

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

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Please note:

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

Part B: Your Comments

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

Name Mr S J Locke	Organisation Hinson Parry				
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Section 1	Paragraph	1.10	Table	
Figure		Question		Other	
2. Please set out your comments below					
See supporting statement					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Section 3	Paragraph	3.6	Table	
Figure	3.1	Question	3.A	Other	
2. Please set out your comments below					
See supporting statement					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mr S J Locke	Organisation	Hinson Parry		
2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	3	Paragraph	3.9	Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>See supporting statement on Key Objectives</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mr S J Locke	Organisation	Hinson Parry		
3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Section 5	Paragraph	5.31	Table	
Figure	5.1	Question		Other	
2. Please set out your comments below					
<p>See supporting statement</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mr S J Locke	Organisation	Hinson Parry		
4. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Section 5	Paragraph	5.36	Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>See supporting statement on Growth options</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Mr S J Locke	Organisation	Hinson Parry		
5. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Section 5	Paragraph	5.76	Table	
Figure		Question	5.L	Other	
2. Please set out your comments below					
<p>See supporting statement on alternative spatial distribution of employment growth</p>					

Please use a continuation sheet if necessary

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

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

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

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

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

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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.

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**STAFFORD BOROUGH COUNCIL
LOCAL PLAN 2020 – 2040
ISSUES AND OPTIONS DOCUMENT**

CONSULTATION RESPONSE

IN RELATION TO

**LAND TO THE SOUTH WEST OF STONE BUSINESS PARK,
STAFFORDSHIRE**

ON BEHALF OF

MR M WEAVER



Contents

	Page
1.0 Background	3
1.1 Introduction	3
2.0 Land Proposals	3
3.0 Comments on Issues and Options Document	4
4.0 Conclusions	6

Appendices

Prepared By:
Stephen Locke BSc(Hons) MRICS MRTPI FAAV
For



1.0 Background

1.1 Introduction

1.1.1 This Supporting Statement accompanies a submission to Stafford Borough Council for the suggested addition of two areas of land to the south west of the town of Stone to be considered as future commercial development sites. The land has future development potential beyond 2022 and could provide a mixed housing or employment development helping to maintain Stone as a sustainable and mixed community within the wider Stafford Borough area.

1.1.2 The statement also provides comments on the draft issues and options consultation document published in February 2020. The issues and options document is an essential piece of evidence to support the new Local Plan process and is required by the National Planning Policy Framework. New planning regulations were published by the Government in late 2017 that required local authorities to review Local Plans at least every 5 years from the date of their adoption.

1.1.3 The areas of land in question are located to the south west of Stone Business Park and one currently connects with the highway network via Jasper Way through Stone Business Park which ultimately links to the A34 main highway. This is therefore a sustainable option for immediate future development of this site. The other more extensive area of land extends south of Stone Business Park and provides short to medium terms opportunities for expansion of the town.

2.0 Land Proposals

2.1 The land is owned by a local landowner Mr M Weaver. The smaller area of land (edged red at **Appendix 1**) is currently farmland extending to around 4.1 ha. At present the area is mainly used as mixed cropping land with a low environmental value. If the local authority are looking for an even smaller employment land extension the site can easily be split in half.

2.2 The larger development site is shown blue edged at **Appendix 1**. This site extends to approximately 16 ha. The Staffordshire Landscape character assessment identifies the land as being of relatively low landscape value and possibly available for restoration. The land falls within the Settled Farmlands landscape character type. Here the medium scale, irregular field pattern has deteriorated considerably by historic rationalisation of field boundaries.

2.3 As far as we are aware, there is no contamination and all the land is free draining. The sites offer an opportunity to create sustainable urban extensions with existing vehicular access onto Jasper Way already available for the smaller area. To the north and east of the sites are a large distribution centre and the Jaguar Land Rover car storage yards.

2.4 Stone is a sustainable settlement with a range of employment, residential, retail and leisure facilities. The current local plan highlights the need to strengthen Stone's role as a key transport hub with the aims being to try and improve accessibility to Stone Town Centre and

reducing the levels of congestion on the A34. The addition of the smaller area of land in question would provide a modest land extension to the existing Stone Business Park with direct access to the main road network via Brooms Road on to A34. The plan at **Appendix 2** shows the site (edged red) in relation to the business park but it should be noted that the business park has since expanded further which has not yet been added to the Ordnance Survey. The current Business Park runs directly along the northern eastern boundary of the land shown.

2.5 The larger area of land shown edged blue may need a link road off the A34 but would provide an ideal future commercial extension for the town. Given the growth in high tech and creative industries it would possibly make an ideal location for a new high tech science and business park. This is strongly supported in the NPPF paragraph 82 which states “*Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations”.* Sensitive landscaping would also have benefits for long term screening of the existing development at Stone Business Park.

3.0 Comments on Issues and Options Document

3.1 Scoping of Issues – Page 7 of the consultation document provides a topic by topic summary of key issues; and the document states that it is intended to guide and assist future work on the Local Plan. Panel 1 mentions Stafford but there is no mention of the vision for Stone – we feel this needs to be included at this point in the document.

3.2 Panel 2 looks at Economic Development and again there is no mention of Stone. The town supports many jobs and industry needs to be supported and also infrastructure, primarily the highway network, enhanced.

3.3 Panel 3 covers issues relating to the Delivery of Housing. We support the delivery of more homes but the Panel should ideally mentioned Stafford and Stone as being the primary focus for housing given their status as principal settlements.

3.4 Panel 6 covers Transport and again fails to mention Stone as requiring an improved highways connection network.

3.5 Panel 7 on page 11 discusses the settlement hierarchy. The impact of HS2 on Stone is mentioned but no detail is discussed. The development of HS2 provides a key opportunity to future proof the long term sustainability of the town and build in more housing and employment opportunities.

3.6 In terms of the Councils vision we agree with the objectives to deliver sustainable economic and housing growth to provide income and jobs. On page 25 we agree with the objectives for Stone but suggest that more emphasis is made of boosting the economic potential and transport infrastructure for the town.

3.7 On page 29 we agree with the delivery of new employment land through the expansion of existing industrial areas and also new employment and housing areas. This fits well with the land proposal set out in Section 2 of this report.

3.8 We also feel that there is an opportunity to provide a link road to the south and west of the town which would open up key areas of land for a mix of housing, employment and wider community benefits.

3.9 In relation to the settlement hierarchy we agree that Stone as being the second largest town in the Borough should be a major focus for development. Given the development of HS2 we feel that more emphasis could be focused on the town.

3.10 Page 52 of the document looks at various spatial scenarios. We feel the best scenarios would be intensification of town and district centres and also around the edge of larger settlements such as Stone. As previously highlighted, the town has potential for future expansion to the south and west.

3.11 Regarding the Growth Options on page 56 we feel that Options 1 and 2 best fit the needs of the Borough. However, under Option 2 we feel that Stone should have a higher level of growth at around 20-30% rather than the 10% suggested. The reasoning behind this suggestion is Stone's excellent transport links (road and rail) and the good range of existing facilities and services in the settlement.

3.12 In relation to page 79 of the document we feel that the spatial distribution of employment growth should be slanted more heavily towards Stone. We would suggest in the region of 15-20% of employment growth on the basis that land is available around the town and the settlement has good road links. The construction of HS2 will also naturally encourage more growth into Stone and additional employment land will enable companies associated with the new railway to locate close to the construction site.

3.13 Overall we feel that the Issues and Option document does not currently comply with the guidance set out in the NPPF (2019). Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. It not considered that some of the strategic options suggested in the Issues and Options document are sustainable in the long term. We feel that there needs to be more focus on the existing sustainable settlements such as Stone and the enhancement of existing facilities and infrastructure which can then support the growth of additional employment, housing and retail development.

4.0 Conclusions

4.1 This statement provides information on two areas of land to the south west of Stone, Staffordshire and also makes comments on the Issues and Option Document published by Stafford Borough Council in February 2020. The land areas shown extend to around 20 ha. The smaller area (4.1 ha) would provide an ideal, small, sustainable urban extension. An option also exists to create a larger extension of the town to south as shown edged blue extending to a further 16 ha.

4.2 The site off Jasper Way at Stone Business Park is immediately developable, achievable and deliverable and would help to provide additional infrastructure and economic benefits to the area.

4.3 The future development potential of the larger site is clear. The land will provide an ideal employment extension or even a mixed employment and housing option for the town of Stone and help alleviate development pressures in other areas of the settlement.

Appendix 1



Appendix 2

