

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

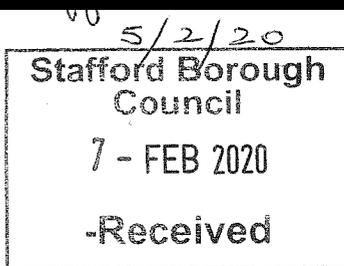
**Residents and
General Public**

3 February - 21 April 2020

Coding	Name:	Organisation:	Page Number
114	Colin & Pauline Hutchinson	Resident	1
115	Chris Bault	Resident	4
116	Andrew Finney	Resident	5
117	James Cawdell	Resident	6
118	Douglas Webb	Resident	7
119	Sue Bramall	Resident	14
120	Ms Holland	Resident	29
121	Mr L Burns	Resident	44
122	Mrs Pauline North	Resident	47
123	Marc Hardenberg	Resident	51
124	Rob Pilling	Resident	59
125	Chris & Tress Smailes	Resident	60
126	David Holt	Resident	62
127	Paul Beardmore	Resident	64
128	JC Hinson	Resident	74
129	Mr B Wiseman	Resident	77
130	Mr Luke Sarjeant	Resident	78
131	Ms A Hindley	Resident	83
132	Mrs Beryl Whincup	Resident	86
133	Mrs E Marston	Resident	89
134	Hazel Charnah	Resident	91
135	Francesca Bramall	Resident	93
136	A Borgman	Resident	97
137	David J Allen	Resident	98
138	Joseph Johnson	Resident	99
139	M.W.T. Barlow	Resident	101
140	Richard Charnah	Resident	102
141	Susanna Munro	Resident	103
142	Hilary Jordan	Resident	104
143	John Jordan	Resident	105
144	Joseph M Craen	Resident	106
145	Mrs. L. Allen	Resident	113
146	C.H Bendall	Resident	114
147	Margaret Lannigan	Resident	115
148	John Lameris	Resident	116
149	Paul Luqman	Resident	118
150	Mrs Jean Moreland	Resident	119
151	Nina Cooke	Resident	120
152	Sally-Ann & Elisabeth McOwan	Resident	122
153	John and Celia Clements	Resident	124
154	Shane Phillips	Resident	125
155	Julia Lameris	Resident	126
156	Joanne Banks	Resident	127

157	Mr and Mrs B R Horton	Resident	128
158	Paul F. Windmill	Resident	131
159	Alison Tilsley	Resident	134
160	A Clark	Resident	135
161	Nigel Holmes	Resident	137
162	Beryl Metcalf	Resident	138
163	J R Prichard.	Resident	163
164	Maria Kalaga	Resident	164
165	MJH & JM Preston – land north of Trent Road, Stone	Resident	165
166	Christopher Dobbs	Resident	166
167	Robin Grime	Resident	176
168	Robert Hine	Resident	178
169	Mary Booth	Resident	189
170	Wojtek Kawecki	Resident	190
171	Jane Bonser	Resident	194
172	Julie Jackson	Resident	201
173	Lucy Welch	Resident	235
174	Pat Tweed	Resident	237
175	Tony Bonser	Resident	242
176	Alan Elliott and Carol Holte	Resident	249
177	Geoffrey White	Resident	250
178	Baxter Nigel	Resident	252
179	Catherine Gill	Resident	253
180	Mary Wilebur	Resident	254
181	Karen Davies	Resident	257

Chief Executive and
Planning Policy Manager,



Dear Sirs,

Local Plan 2020-40

I refer to your letters of 31-1-20,
inviting comments to the Council and
officers on planning and biodiversity.

You will be aware of the considerable
concern of scientists, politicians and
governments in response to carbon emissions
and global warming. Many recognise
that a reduction in human activity
where carbon emissions are involved is
becoming a prime necessity.

The build up to the Conference on
Global warming in Glasgow later Page 1

year will highlight everyone's part in impending catastrophe unless major changes in our activities are adopted.

The most significant factor in carbon emissions is population growth. Other factors, although important, are secondary.

Our government, along with many others have signed up to impressive targets.

These targets should now be translated into policies which are achievable.

The plans for Stafford Borough need to reflect the need for a reduction in the population growth.

Zero expansion is the answer, which may not be popular but it is most

significant. All Councillors and

their officers should aim to reflect

measures to avert an impending

disaster by ensuring that Government

policy and all planning measures will
reduce the risks now being faced.

Yours sincerely

[REDACTED]
email: [REDACTED]
[REDACTED]

Colin and Pauline Hutchinson

Copy to Hixon Parish Council.

Mr C Boulton response – 8 February 2020

From: Chris Boulton [REDACTED]
Sent: 08 February 2020 09:00
To: List-ForwardPlanning-SBC
Subject: Stafford local plan 2020-2040

Hi Folks,

I'm a local resident who has lived [REDACTED] in Stafford. I take an interest in local affairs.

I have read your local plan. My overall impression is that it is long on words and short on action.

Its a very long document, but despite that lacks specific detail in many areas on tangible actions that could enhance our environment.

Stafford and the surrounding area is growing at an unprecedented level. I have seen many housing estates build in my time, but never so many housing developments as in recent years. I accept people need somewhere to live but question the need for so many new houses. Where will all these people work and where is the infrastructure to support them?

Travel levels continue to increase with no major development in the road system in many years. The current east /west development is welcome but limited in scope. Stafford faces gridlock now, especially when there is a problem on the motorway. Without substantial road improvement and consideration for schemes like park and ride, the situation will only continue to deteriorate.

I am not reassured by your document that these concerns will be adequately addressed. In 'Key objectives' point 16 you make only passing reference to transport links. Section 6, 6.3 refers to 'excellent transport links' - where are these? Section 12, 12.7 refers to connectivity but fails to describe how this might be achieved. Frankly you seem complacent.

On the environment section 4.14 planning being required to 'consider' green development is not strong enough to be other than tokenistic. I found very little reference to planting trees, this was not a feature until 9.1. Section 7 seems to regard Stafford town centre as somehow vibrant, it clearly is not. Again where the practical detailed proposals to address this decline?

Section 5 outlines options for substantial housing growth. Option 5, as a mixed approach seems to me to be the best way forward.

Might I suggest that you produce an executive summary and a much more specific action plan?

Regards,

Chris

Mr A Finney response – 19 February 2020

From: Andrew Finney [REDACTED]
Sent: 19 February 2020 00:32
To: List-ForwardPlanning-SBC
Subject: Local plan 2020-2040 (Issues and options consultation non technical summary Feb & March 2020)

Dear Sir/Madam

Regarding the above 8 (8.1) - " What about Green Belt Settlements" I refer to Barlaston ; Fulford/Saverley Green, I would ask, does this indicate under the new Development Plan that infill development would be permissible even though it is in the Green Belt?

At the present time this does not appear to be the case.

May I state for the benefit of your consultation that I would be in agreement with infill as this would not effect regulations on urban sprawl and so would not be classed as inappropriate.

I look forward to your reply.

Regards

Andrew Finney.

Mr J Cawdell response – 24 February 2020

-----Original Message-----

From: James Cawdell [REDACTED]
Sent: 24 February 2020 20:20
To: forwardplanningconsultations
Subject: New Local Plan 2020-2040

Hello

Following this evenings drop in at Eccleshall I would like to forward my opinions:

New Garden Town - Meece Brook:

Reading the pre-tender information for the planning consultants I am really surprised to read they are investigating ways to bring gas lines into the development. Surely if this went ahead it needs to be as close to carbon neutral as possible and the town needs to find ways to produce its own power. I was pleased Severn Trent suggested they would find ways to create a closed loop system to recycle waste water.

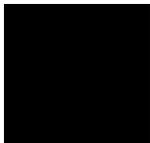
We live in Mill Meece and the initial concept showed a rail link going straight through our village destroying our local community and many homes. If this got to planning stage, as a community we would strongly want to be ring fenced and all existing properties and private land kept safe.

Is the MOD land suitable for housing? This used to be a munitions factory and have heard the land is heavily contaminated and may have been used for nuclear testing at some point during the Cold War.

If any new garden town went to planning I'd really like the council to push the boundaries in design, eco build and futuristic transport solutions. The last thing we would want is 10,000 featureless bright red cardboard box houses piled on top of each other similar to Beconside etc etc.

Kind Regards

James Cawdell



**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	Douglas	
Surname	Webb	
E-mail address	[REDACTED]	
Job title (if applicable)	n/a	
Organisation (if applicable)	n/a	
Address	[REDACTED] [REDACTED] [REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

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

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

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

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

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

Please note:

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

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

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	1	Paragraph	1.2	Table	
Figure		Question	Bullet Point 3	Other	
2. Please set out your comments below					
<p>Have we really followed the NPPF by providing supporting infrastructure for the new developments? In Gnosall, since the new developments, traffic congestion is appalling, appointments at both Doctor and dentist are difficult at best to obtain, we have no Post Office and currently two to three pubs are either permanently closed or shut for a substantial period of time.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	1	Paragraph	1.3	Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>If local plans are to be revised every five years and the revision impinges on a made village neighbourhood plan currently I am informed there is no funding for restarting the NP process and that NPs cannot be amended, they have to go through the complete process again. This surely is undemocratic, so can they be likewise amended as the Local Plan and who going to have to fund the NP revision?</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

Part B: Your Comments

Please complete a new Part B for each representation you wish to make.					
Name		Organisation			
2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	1	Paragraph	1.5	Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>I thought that the Stafford Borough 5 year housing land supply was fully covered using the two available methods used at that time and as presented by Meliisa Kuryiaki. So is all this re-calculation a punishment for success?</p>					

2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	1	Paragraph	1.10	Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>All panels do indeed speak the speak, however: Panel 3 Bullet Point 5 Provision of bungalows. This has never happened because the developer can't squeeze enough of them on site to make his profits, so this won't happen unless the planning department force the issue! Panel 4 Bullet Point 3 & 4: Provision of healthcare facilities and educational facilities didn't happen last time despite promises from the developers, so why should it happen this time? Panel 6 Bullet Points 1, 2 & 3: Provision of fast broadband (won't happen unless providers are incentivised, Public Transport provision is a farce in the outlying villages and I can't see it improving with even more cars on the roads and highways can't cope with the traffic on them now let alone another up to 7K+ bothway journeys per day</p>					

Part B: Your Comments

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

Name		Organisation			
3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	2	Paragraph	2.19	Table	
Figure		Question		Other	

2. Please set out your comments below

Connectivity, it states that we have excellent Road and Rail Links! Is this serious? Each time there is an accident on the M6 in either direction between Junction 15 and Junction 12 Stafford becomes gridlocked. The all heralded Western Relief Road is not going to be the panacea, it'll just shift the problem to the north of the town centre. As for the trains, they aren't too bad as long as you can afford to use them. So what is proposed to ease the traffic problems in Stafford?

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

Section	3	Paragraph	3.3	Table	
Figure		Question		Other	

2. Please set out your comments below

Vision:
d. reduced the need to travel, through the provision of increased services and facilities in key locations to sustain the surrounding rural areas
f. improved accessibility to services and facilities by providing safe, attractive and convenient sustainable connections from and to new developments;
h. community supported Neighbourhood Plans in place
i. delivered new development, where possible through the re-use of brownfield land and land not of high environmental value, in sustainable locations at Stafford, Stone and the Borough’s selected villages;

To d, f, h & I I say “really?” points d & f “How?” point h, revise NP completely or amend it if necessary, but who is going to pay? Point i) Will the building of new estates on flood plains be stopped?

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

Name	Organisation
------	--------------

4. 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

2. Create new communities supported by district centres, open space, sport & recreation provision, new health centres including GP surgeries and new primary schools Will this happen as it never has before

7. New open space, sport and recreational facilities, including indoor and outdoor provision, to meet the needs of an increasing population Will this happen as it never has before

11. Deliver the Western Access Improvements to improve the transport network to the west of Stafford town centre, deliver the Northern Access Improvements and implement the Eastern Access Improvements. All this will do is shift the problem to the north end of the town!

--

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

Section	5	Paragraph	5.3	Table	
Figure		Question		Other	

2. Please set out your comments below

SP2 – Presumption in Favour – if this happens it is a developer’s passport to print money!

Para 5.10 – 5.16 As said earlier, is this a punishment for being successful with the Borough 5 year Housing Land Supply? Sure seems like it

Beware, Table 5.3 it presents in percentages not in actual figures so it can at first sight look as if an area hasn’t had much development.

Para 5.18 Changes to Settlement Development Boundaries – Sounds dangerous to me!

Para 5.22 Updated NPPF proposes that 10% of existing must be 1 Hectare or less, hence more small development in rural hamlets, perhaps not a bad thing?

Para 5.34 If either of the two sites around Gnosall are developed there will be an extra 3.25K to 3.5K bothway journeys each working day, this is assuming each household has one car, if both are built it will equate to 6.75K bothway journeys per day. We know this to be an under estimate. The A518 and surrounding lanes, already creaking at the seams just will not be able to cope, so what is to be done?

Ms S Bramall response – 24 February 2020

From: Sue Bramall [mailto:]
 Sent: 24 February 2020 20:21
 To: forwardplanningconsultations; Alex Yendole
 Cc: John Leather ()
 Subject: New local plan - Scoping the issues - Slindon and Croxton

Dear Mr Yendole

It was good to meet you at the consultation in Eccleshall this evening. As requested, here is a copy of the response to Question 4 from the Eccleshall's response to the 'New Local Plan Scoping the Issues Report' in the Representations Form:

I have attached a copy, but it says:

Q 4 – How could the new local plan support local villages and their communities to grow and thrive?

Answer:

Eccleshall Neighbourhood Plan initially suggested Croxton as a potential location for additional housing, however with the loss of the bus service it is now considered a less suitable location. Slindon, although also without a bus service, is on the A519 and would be considered for suitable small scale development.

Slindon is less than 1.5 miles from Eccleshall, so easily walked or cycled, and it is even closer to Raleigh Hall employment zone.

In terms of community facilities, it has the church and the fishery.

As I mentioned, there was and is 100% support in the community for a project comprising one self-build house and a public car park for the church and community, which has been refused for being outside current policy.

We are keen to know how this project – which has strong local support and addresses a key highways safety issue for elderly churchgoers – can be included in the next Neighbourhood plan for Stafford?

It will be even longer if we have to wait for the Eccleshall plan to be redone.

Given Eccleshall Parishes comments about Croxton – surely Croxton should be replaced with Slindon in **Growth option 6**: Concentrate development within existing transport corridors / clusters of communities

l ii – Croxton – Eccleshall – Great Bridgford – Cresswell – Stafford.

Given that 4 of these are on the A519, it would make more sense to start on the A519 at Slindon and come past Raleigh Hall into Eccleshall and on into Stafford.

With best wishes

Sue Bramall
 Slindon Resident.

Question 4

How could the new Local Plan support local villages and their communities to

Eccleshall Neighbourhood Plan initially suggested Croxton as a potential location for add however with the loss of the bus service it is now considered a less suitable location. Similarly also without a bus service, is on the A519 and would be considered for suitable small scale development.

Infrastructure needs to be considered pro-actively, ahead of any planning development these locations.

Specifically, expansion of local health service provision to support a growing, and again

CONSULTATION RESPONSE TO

Stafford Borough Local Plan 2020 to 2040

Issues and Options Consultation Document – February 2020

Section	Comment
1.6	<p>This is such a long document – and really hard for a single resident to plough through. It is no wonder big developers employ lawyers.</p>
Q1.A.	<p>Is the evidence that is being gathered a suitable and complete list?</p> <p>This is hard to tell, for someone who is not a planning lawyer / consultant.</p> <p>I note previous objectives to encourage self-build, but can find no summary of evidence relating to sites proposed for self-build within the SHELAA</p> <p>Similarly, in regard to objectives for carbon-neutral houses, bungalows or ‘lifetime’ homes, I can find no useful evidence of current provision or need or sites available for supply.</p> <p>We know that large developers are not interested in these low-density projects, and will only try and squeeze more houses onto a development once planning permission has been obtained.</p> <p>We can find no public information on the borough’s progress in these types of housing since the start of the current plan. It is not easy to see in the monitoring reports, and should be.</p> <p>I can see no objective evidence for progress with Fibre broadband schemes in the borough – BT/Openreach and Superfast Staffs are making claims of 95% which are simply not true. How can you monitor progress without transparent and accurate data on actual speeds. 10MB is not super fast.</p> <p>How are you researching the views of the 39% of people who live outside of Stafford and Stone in smaller towns and rural areas? We have not received a questionnaire to complete (as we did for the previous plan)?</p> <p>What evidence is there in regard to the need for safe cycle paths? – I would love to be able to cycle to work on a REALLY safe track, and would happily leave the car at home if this was possible.</p>
Q1.B	<p>Have any key pieces of evidence necessary for Stafford Borough’s new local plan been omitted?</p> <p>As yet, I cannot see the inclusion of Slindon as a proposed village within the settlement hierarchy (replacing Croxton) – as supported in the response from Eccleshall Parish Council Q4.</p>

	<p>This is a situation where the whole village supported a small project (house and car park for church) but as the area was covered by the Eccleshall Plan, it was deemed 'against policy. If localism is to filter down to the smallest community, their needs should be included and not ignored.</p> <p>Please replace mentions of Croxton – with Slindon.</p> <p>In regard to Self-build – as you have a register of would-be self-builders you could write to them to ask them what they think of the proposals which are covered in sections 8.33 to 8.37.</p> <p>Many of the objectives are not SMART (specific, measurable, achievable, realistic and timed).</p> <p>For example – how many electric charging points are there? And how many do you want by 2040?</p> <p>Have you asked estate agents what sort of houses they perceive there to be demand for? The ones I know say there is a big shortage of bungalows.</p>
2.4	<p>Surely the number of bungalows needs to be split out, given the point in 2.3 that there will be a “significant increase in the over 60s (33%).</p> <p>This paragraph reads as if the council is embarrassed by the number of detached properties, instead of proud of the quality of housing in the borough – particularly if you consider the need for electric charging points – which is an issues for those who live in flats.</p>
2.16	<p>The risk with the 'New Garden Settlement', is that it will enable them to tick their 'Housing need target' with a single project – and at the same time continue to frustrate any development for the 39% of the population who live in rural villages which they do not wish to leave – and where the NPPF now encourage small scale development.</p> <p>By its nature, this will be a large scale project dominated by the big housebuilders, and will not help meet any targets in regard bungalows or address the rural housing crisis.</p> <p>Big developments always promise schools and doctors etc (via s106 agreements) but despite all the development in Eccleshall – nothing actually seems to materialise to benefit the community.</p>
2.21	<p>The borough needs to be honest about the fact that the town centre is in decline, and a strategy of extending the retail area will only cause more decline in existing shops. There is nothing unique about the retail experience in Stafford to draw people from beyond the town.</p> <p>Even the M&S is so small, that if you need furniture or clothes it is better to go to Wolstanton or Telford.</p> <p>Why is the retail experience so poor compared to other county towns like: Shrewsbury or Chester or Derby? What can be done about this?</p>

	<p>With such excellent road and rail links, there is clearly an opportunity to attract people, but you need a better mix of with the right mix of leisure and retail. Aim for something big, like the V&A of the Midlands!! Do any councillors know Tristram Hunt?</p> <p>Unless this is addressed honestly, it will not get any better.</p>
3.1	<p>“... with strong communities” is part of the vision, and mentioned in the second and third bullet points.</p> <p>But yet the needs of small villages like Slindon, are ignored and excluded from policies at the expense of concentrating everything in KSVs and potentially the new Garden Village.</p> <p>Slindon is being failed in regard to:</p> <ul style="list-style-type: none"> • road safety, • safe community parking, • flood protection and • FTTP broadband.
3.A	<p>The vision is good, but this needs to translate to meeting the needs of the communities that you serve – instead of just focussing on Stafford (j-o) and Stone (p-x)</p> <p>Where are the objectives relating to the 39% of taxpayers who live in the rural villages?</p> <p>There should be more balance, and any objectives should be SMART, (specific, measurable, achievable, realistic and timed) with transparent KPIs published.</p>
Fig 3.1	<p>These are so woolly to be almost meaningless, for example: “Recognise and address issues associated with climate change and global warming” That takes about 30 seconds to achieve.</p> <p>What about something specific, such as:</p> <ul style="list-style-type: none"> • Ensure all new housing is carbon neutral by 2040. • Increase number of electric charging points from X to Y • Increase length of off-road cycle trails from X to Y • Achieve 95% recycling.
sQ 3>B	<p>Yes, it should be shorter, but it also needs to be SMARTer and needs to cover the 39% in rural areas.</p>
Q 3 C	<p>Yes - What about something specific, such as:</p> <ul style="list-style-type: none"> • Ensure all new housing is carbon neutral by 2040. • Increase number of electric charging points from X to Y • Increase length of off-road cycle trails from X to Y • Achieve 95% recycling.
Q3D.	<p>What is the alternative to the ‘spatially-based’ approach?</p> <p>Yes – it does seem to duplicate eg 13 and 21 – but the current strategy prohibits any new development outside KSVs, even though there are many ‘achievable’ infill plots in small villages which are considered against policy.</p>

	<p>You do not mention the government objective for more small developments, which create economic benefits for small builders and artisans.</p> <p>Someone self-building on land that they already own does not have to find £200,000+ for a plot, which a major housebuilder would squeeze 2 or 3 houses onto.</p>
Q3E	<p>The number is not relevant.</p> <p>They should be more specific with a clear KPI – so that it is easy to identify if something has been achieved.</p> <p>Some are very woolly and sound more like policy than objectives.</p>
Q3F	<p>Yes - Suggest:</p> <p>Support very small rural village communities to achieve the development which they desire, particularly where this supports elderly residents to stay in their communities.</p> <p>Support local builders, self-builders and carbon-neutral builders by making small sites available sooner and reducing reliance on large housebuilders.</p> <p>Very small villages (under 50 homes) should not be excluded – this is discriminatory.</p>
Q4.Aa	<p>Should the new local plan be more ambitious and raise the bar.</p> <p>YES YES YES – Lets put Stafford on the map for its environmental credentials!! This plan covers the period to 2040 – leaving only 10 years until 2050.</p> <p>If you don't make significant advances now, and take bold steps – how will you do so much in the last 10 years to 2050.</p>
Q4.Ab	<p>Stafford could be a perfect base for cycling tourism – Cannock chase is fantastic for mountain bikers, and there are a few safe trails around town– but not many to connect Stafford with the villages for tourists</p> <p>Yet there are lovely villages and gorgeous pubs and places to visit that can be combined to make a great cycling holiday.</p> <p>Its not too hilly, so great for all levels of cycling ability.</p> <p>However, roads are dangerous, due to large number of HGVs and poorly maintained.</p> <p>Improving cycle-friendliness would be good for local residents re health & fitness, and less use of cars and great for tourism.</p> <p>Why not provide all council employees with bikes, instead of parking places??</p> <p>With all the wetlands, it seems that there might be an opportunity for more nature tourism too.</p>

	<p>The Council needs to make progress with the Self-build programme – we have applied to build a carbon neutral house a few years ago, and there has been no actual ACTION.</p> <p>There are many options for carbon-neutral home which are high quality and attractive designs.</p> <p>Why is the council dragging its heels on this policy, instead of embracing this policy and encouraging such high-quality additions to the housing stock?</p>
Q4B	<p>Which types of renewable energy</p> <ul style="list-style-type: none"> - I think you need to ask an expert, as I think access to the national grid is a key factor. - but do not ruin the local environment with solar farms, wind turbines and smokey incinerators – - <p>Solar panels can go on the roofs of factories / schools / leisure centres / supermarkets.</p> <p>Batteries can go in business parks.</p>
Q4C	<p>This depends if you mean large housing or business developments?</p> <p>Business – yes</p> <p>Housing – not sure</p>
Q4D	<p>Any wind energy plants should be close to the houses of Borough Councillors and planning officers – see how they would like the constant noise, their view ruined and their house devalued!</p>
Q4.E	<p>This is an odd question?</p> <p>Why no question about addressing the flood problems across Stafford – after 2 bad floods October 2019 and February 2020 – this needs to be included in the plan.</p>
Q.5.4	<p>Our experience has been that the Council does not take a positive approach – and routinely advises applicants with plots outside the KSVs that they will not be permitted “because this will set a precedent for elsewhere” rather than looking at a proposal on its merits.</p> <p>The impression is that “defence of the plan / KSV policy” is far more important than whether the community supports the development or there are material considerations – leaving individual developers with only the option of going to appeal – a strategy which is only affordable by the large scale developers.</p> <p>The 8% allowance for homes outside the main towns (where 39% currently live) was already mainly used up before the last plan was adopted – effectively stopping nearly all development in rural areas – despite a nationally acknowledged crisis in rural housing.</p> <p>This causes bed-blocking, as people stay in empty nests in the country if they do not want to move into a town – this is ‘unsustainable’ as it prevents the normal cycle of people downsizing in rural areas, and new younger families moving in. The impact of this can be seen in the change in age profile in Stafford and rural areas.</p>

Q5B	<p>This approach focuses purely on number of housing units – not by type. An analysis of progress on the previous plan has shown hardly any provision of:</p> <ul style="list-style-type: none"> • Bungalows • Self-build • Rural affordable housing <p>It would be easier to make a meaningful decision, if these figures were alongside some indication of current households. Surely you need to ask: In the next decade, how many: Young people currently at home will want to move out? How many first time-buyers will start a family and need somewhere bigger (near a school)? How many people will become empty nesters, and wish to downsize? How many people will develop care needs and need extra care?</p> <p>The Garden Community should be considered as a SEPARATE exercise – and not as a method of QUICKLY meeting target numbers, rather than actually meeting the needs of people who live in the borough.</p> <p>Stafford Station Gateway, should not been seen as a job-creator unless there is a significant change in other economic strategies. The big risk here is that the town centre moves further away from the north end / Square and you simply move retail and jobs – as happened with the M&S precinct.</p> <p>A key problem with the current station is parking, There is no point shaving 10 minutes of a journey with HS2,, if you have to allow another 30 minutes to find somewhere to park and walk to the station – which happens at peak times.</p> <p>PEASE< PLEASE< PLEASE can the council erect some signs on the approach into town (eg Foregate Street) to show if the station car park is full. At the moment, you don't know until you get to the station, and you might be in a terrific panic to then find a space and get back to the station for your train.</p>
D5D	<p>Settlement Hierarchy</p> <p>Preventing any development in the smallest rural village settlements is not sustainable, as it is failing to bring young energetic people into the smallest villages – and they play a vital role in community activities eg organising events and mowing lawns for church or elderly neighbours. These villages are aging – which is not sustainable.</p> <p>Why will 'pepper-potting' limit infrastructure? Surely the infrastructure suffices for neighbouring properties, so one more here and there would not add a great deal of strain.</p> <p>These 5 bullet points indicate a predetermined negative bias against any 'infil in rural areas'.</p> <p>The key consideration should be whether that community supports the development.</p> <p>Agree that the settlement boundaries are causing commercial property to be used for housing instead of business – this is clearly the case with the garage site in Eccleshall,</p>

	<p>and likely to happen with the Old Smithy. So alongside the 27% growth in homes, where will new jobs come from?</p> <p>RE: 5.22 - There are many small rural communities which could accommodate one or two new homes which would not put pressure on infrastructure – but would create work for local builders and artisans.</p> <p>The ‘broad catchment areas of the neighbourhood plan effectively close off the opportunity for a small community to do anything locally – as was the case in Slindon, where a project with 100% community support was vetoed because the area was already covered by the Eccleshall plan.</p> <p>5.23 – Infill plots are now classed as greenfield, even if they are too small for productive farmland – but seem to be confused with Greenbelt. There are many greenfield-infill plots which could be used up before Greenbelt is considered . These are ideal for self-build, especially bungalows or lifetime homes.</p>
Q5D	<p>Please note that the ECCLESHALL Parish Response promoted Slindon for development as a Small settlement – Not Croxton.</p> <p>Slindon is close to Raleigh Hall Employment Zone, has a church, a fishery and a bus route.</p> <p>Please double check their response document – and amend to include Slindon instead of Croxton.</p> <p>5.26 – There are many rural buildings where farmers simply apply for planning permission for tax relief purposes – but they have neither the funds nor the intention to develop the units.</p> <p>This allocation should not be restricted to redevelopment of rural buildings. This discriminates against many people who work for themselves in rural areas and also create jobs (but are not farmers).t</p> <p>Self-build and bungalows should be a priority for the small plots – as they will not be of interest to major housebuilders.</p>
Q5F	<p>The best option is Dispersal of Development as it spreads development evenly around the borough and does not unfairly put pressure on some areas or prevent development in other areas.</p> <p>Rather than a focus on number and location, the strategy should focus on:</p> <ul style="list-style-type: none"> - Type - Quality - Environmental issues - Community. <p>If houses are permitted in appropriate style and density, then there should be no adverse affects on the community.</p> <p>Density relates to green space which is important for carbon policies. Developers want to squeeze more and more properties on sites like Sancerre Grange with smaller and</p>

	<p>smaller gardens – so there are few trees and hardly any green margin between houses and the roads.</p> <p>Hi density housing needs to be offset with green borders / boundaries and high-quality tree-planting – not just a few beech sticks! Low density means generous gardens and green trees and flower borders.</p> <p>In what way will a smaller settlement be adversely affected by one or two new homes? Sounds very NIMBYish. They are more likely to be enhanced by some fresh blood who can be enlisted to do jobs that older people would like to step down from.</p>
Q5G	<p>The Garden Community should be a separate exercise – and should not be a reason to restrict development across the rest of the borough especially in rural areas.</p>
Q5H	<p>Only number 3 and 5 are compliant, as No 6 restricts villages.</p> <p>5.59 refers to development in Croxton – when the Eccleshall Parish response indicated that Croxton is no longer sustainable – and they supported small scale development in Slindon.</p>
Q5.P	<p>No – Excluding villages with less than 50 dwellings will exclude numerous small settlements with suitable infill plots for one or 2 new houses.</p> <p>Specifically Slindon is on the main A519, has 100% community support for a small project with one house and public car park for church. Will this be prevented for another 20 years? Despite all the community support?</p> <p>Re 5.83 refers to development in Croxton – when the Eccleshall Parish response indicated that Croxton is no longer sustainable – and they supported small scale development in Slindon which is within walking/cycling distance of Raleigh Hall employment zone.</p> <p>This effectively excludes a large proportion of borough residents from having the right to apply to develop their own land for a retirement home – despite the government seeking to encourage self-build - when external housebuilders and developers such as St Modwen have carte blanche to develop large sites due to their large legal budgets.</p> <p>The council should put local residents first.</p> <p>Why discriminate against the mainly elderly residents who are forced to choose between staying in a house which is too big and potentially unsuitable, or leaving their community where they have friends and people who can support them with trips to the doctors or help with shopping.</p>
	<p>5.87 - The proposed development in Slindon of one house + car park would still be prohibited under this policy.</p> <p>Even though it is less than 1 hectare and the car park will help the community to improve highway safety at no cost to the public purse.</p>

Q5P	<p>If this only includes the settlement boundaries established in PSFB – then this effectively ignores many of the sites put forward in the call for sites – making that a pointless exercise.</p> <p>If a site was put forward then it should be considered properly on its merits, especially if under 1 hectare and enhances any village.</p> <p>“Important gaps” is a vague term and hard to distinguish from “infill” – what is the difference? Could this be defined in terms of size or village density?</p>
Q6>E	<p>Yes the planning boundaries for housing make it an obvious choice for a business owner to try to get planning for housing – as is the case with the eyesore building on Foregate Street. This should be zoned for employment, so that the owner does not leave it there and hope for housing at much higher land value.</p>
Q6.I	<p>YES – BUT - The borough should insist of FTTP (not fake super-fast-broadband at a pathetic 10MB) across the whole borough if it is serious about economic development in the town and rural areas.</p> <p>This is embarrassing, and will not help you attract top notch employers and high-tech staff I the internet remains in the dark ages.</p>
Q6J	<p>YES – BUT As well as 4,000 businesses in rural areas, there are many people who do or would like to work from home part or all of the week (saving carbon in travelling) but cannot due to pathetic internet.</p>
Q6. L	<p>Yes – Cycle tourism is worth £635 million pa https://www.funding4sport.co.uk/downloads/cycle-tourism.pdf</p> <p>An emphasis on safe cycle routes for the borough alongside Cannock Chase could make it a really attractive national; / internationally renowned hub.</p>
Q8.F	<p>The number of bedrooms is not the only factor. Someone who is elderly or disabled may need groundfloor bedroom. Or a young family with an older relative who lives with them or visits frequently.</p> <p>You need to focus on type of accommodation as well as number of bedrooms.</p> <p>What about people who have a dog and need/want a garden? Housing need is determined by more than just number of beds.</p>
Q8.H	<p>Why restrict this to affordable homes? Why can't Stafford take a lead on this?</p> <p>8.19 – It is important to recognise that someone in a too-big rural home may be keen to downsize – but not to a new-build on a housing estate with no garden and no storage space for a lifetime of family junk. They may want a smaller house, but still in the countryside, with a decent size garage.</p>

	<p>8.20 – Not all older people will need to go into care homes – many can look after themselves very well in a bungalow with the right type of accommodation and good friends and neighbours. This is community!</p> <p>8.21 – You do not mention bungalows. Why not? Do you want to go into a care home?</p>
Q8.I	<p>Yes, Yes, Yes ...</p> <ul style="list-style-type: none"> a) Yes, but Im sure developers will wriggle out of this somehow. b) YOU need a variety of bungalow plot sizes for those who like to keep healthy and active gardening, and those who don't. c) Yes – your best bet is to encourage this via infill / self-build as people who already own the land are not motivated by ROI, they just want a good retirement home for a parent or themselves or a starter home for their kids in the community where they already live. d) Can you introduce a restriction (a bit like Over 55 flats) that an infill plot in a small village must include a disabled / accessible bathroom on the ground floor? Or must be built by someone who has lived in the village for 5+ years.
Q 8 L	<p>This seems to effectively squeeze out a single self-build on a rural plot – so no.</p> <p>This has been the previous policy but does not work.</p>
Q8.N	<ul style="list-style-type: none"> a) This assumes that the self-builder wishes to be on a high-density development which may not be the case and this will frustrate these people who are keen and willing to invest in high design standards and carbon-neutral homes. The register indicates that most want to be in areas where you would be unlikely to grant permission for 100 homes! You could consult with all the people on the self-build register to ask them this question and the other questions. b) The recent 'call for sites' includes many small sites which would be ideal for self-build and should be encouraged. If the council allocates plots where people do not wish to live, then they will just become 'development plots' and people will not spend as much as they would if they were going to live in them. <p>This section (and much of this report) reads as if you are including this (at the end of the section) only because you have to – not because the borough is enthusiastic about having some fabulous 'grand designs' homes in the borough.</p> <p>Not only would these provide economic benefit to small builders and artisans, but they would increase the appeal of the borough to successful entrepreneurs – who currently prefer to live in Shropshire and Cheshire where they are encouraged to build beautiful properties in the rural areas and create nearby jobs.</p>
Q 80	<p>Yes – This would be a very good idea – and answers the points which I have made above.</p> <p>Yes – I think that this would prevent speculative development and would maintain community.</p>

Q9.A	<p>a) If you are serious about being Green, then this needs to run through all policies. For example, insisting on a certain percentage of high quality landscaping – not just a few cheap beech sticks or the odd rowan. What trees do we need to balance out the planned housing? Where can these go in Stafford (not some overseas carbon offsetting project).</p> <p>b) I’m not sure what you mean about green infrastructure – but safe cycle paths in the fields, as they have in Holland and Germany are green in that they encourage people to cycle rather than drive. These are also used for leisure by walkers and people with pram or wheelchairs. Eccleshall is a great base for walking, with its pubs to start and finish, but nearly all the walks involve a part which is on main road and unsafe. I have been in wetland areas in Norfolk with very good boardwalks for wheelchair users.</p> <p>Protecting, enhancing and promoting cyclepaths, footpaths and nature – is a great combination for tourism.</p>
9.B	Yes
9.C	<p>a) Yes</p> <p>b) Yes</p> <p>c) Yes</p>
9.E	<p>In relation to the self-build policy within rural area infill plots proposed – you could strongly encourage % of tree planting on site.</p> <p>Could trees be planted on land which farmers are currently being paid to set-aside?</p> <p>Could more trees be planted in urban areas – I suspect there are numerous opportunities to plant more trees in the towns.</p> <p>Leafy towns are more attractive to residents and visitors– look at Nantwich or Lichfield ...</p>
9.F	<p>This seems to be saying that it is OK for developers to maximise density by minimising gardens as long as they include an area somewhere else.</p> <p>But lack of a garden big enough to kick a ball around in, or do any gardening in, is part of the reason people lack exercise.</p> <p>Communal areas are often messy and neglected. It is better to give houses enough space, and the home owner will be responsible for looking after it.</p>
9I	<p>No – the current system works well and is already quite restrictive.</p> <p>Many of these restrictions prevent enhancements which would help the elderly, disabled or those with prams – such as access or toilet facilities – and in fact mean that fewer needier people can enjoy them.</p>

	There needs to be a balance, and so far I have not seen anything about Equality or the Equality Duty in the first 126 pages.
9.J	I'm not familiar with current guidance, but it there seems to be a low standard in Stafford compared to places like Shrewsbury, Chester, Cheltenham.
9L	Yes – Building for Life should be encouraged and other enviro-standards.
9.43	Do you mean accessible to disabled people too?
9.O	Eccleshall would be a good location for the new swimming pool.
10.C	<p>Recycling in Staffordshire seems all mixed up compared to other boroughs and overseas, where there is a better culture and facilities.</p> <p>I have no idea what the current system is, and better information should be made available.</p> <p>This should be a separate borough-wide debate and strategy if we are going to get serious about it in the next 20 years?</p> <p>What is the point of having rules for shop signage, but no rules on shops producing plastic waste which the council has to deal with?</p> <p>Set an ambitious target of 90% and ask the young people in schools and college, as well as older residents and businesses how this can be achieved. You might get to 80% or more!!</p> <p>Be ambitious!</p>
11A	<p>The focus on housing supply is on numbers and areas – not on types of housing which can enable independent living – ie bungalows</p> <p>Facilitating safer footpaths and cycle paths will increase exercise – Stafford is a flattish borough, but has high volumes of HGV traffic, and these make the roads unsafe for pedestrians (as many rural roads do not have footpaths) and cyclists,</p>
12 B	<p>a) I have no idea how this is done in Holland and Germany, but it works very well there. Perhaps someone could go and investigate.</p> <p>b) If we are paying farmers to set aside land that is not used, why not pay them for a narrow strip of land which can be a safe path?</p>
12E	<p>The rural areas must be brought up to speed with FTTP – it is embarrassing compared to rural Devon and Norfolk. How do they manage it, and Stafford cannot when it is in the middle of the country?</p> <p>Is the budget being mis-managed?</p>
14A	No the current monitoring reports are opaque and only focus on topline numbers

	<p>SP2 – does not break down the types of housing built. You need to track numbers of bungalows, flats, self-build etc</p> <p>SP3 – does not track developments in rural areas. How many rural buildings have had planning permission for many years without being developed?</p> <p>SP6 – why does this track land, instead of units / bedrooms?</p> <p>Policy E2 – why is this number, not floorspace as in E1? Indicators should be consistent!</p> <p>E6 – What about AirBnB or self-catering units, or km of cycle paths / footpaths?</p> <p>E8 – Needs to monitor % of occupied /vacant property too – or you are just moving development around the town and creating problems at the other end of the high street.</p> <p>C1 – Need to include Bungalows and Self-build.</p> <p>A lot of the indicators are very negative, rather than reflecting what should be achieved to meet objectives. For example C5 – why not measure</p> <ul style="list-style-type: none"> - 'Number of houses on infill plots? - Number of self-build homes? <p>N2 – Surely % waste recycling should be a separate objective / indicator.</p> <p>What about measuring Trees cut down? Trees planted? Number of electric charging points Amount of energy produced in the borough Number of self-build completed Number of properties with 100MBS FTTP Number of properties 35-100 MBS Number properties 10-35 MBS Number of properties 0-10 This is all available from BT</p>
	<p>FLOODING</p> <p>Have I missed a section on flood risk and flood prevention?</p>
	<p>EQUALITY & ACCESSIBILITY</p> <p>Have I missed a section on this? Should it have been covered under health & wellbeing?</p>

**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	A.	
Surname	Holland	
E-mail address	[REDACTED]	
Job title (if applicable)		
Organisation (if applicable)		
Address	[REDACTED] [REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

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

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

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

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

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

Please note:

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

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

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
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.B	Other	
2. Please set out your comments below					
<p>There is no mention of any study of existing infrastructure and in particular sewerage, electricity supply, road structure and its ability to cope with what, for certain settlements, would be a doubling or more of the existing capacity.</p> <p><u>Sewage</u> I note that for Gnosall what is proposed is a virtually doubling of housing but no reference is made to how the current ancient and somewhat inadequate sewerage system would cope with this nor if the sewage plant could take on the additional capacity.</p> <p><u>Flooding</u> There are already problems with runoff water with areas being flooded in Gnosall, including right next to an electricity substation, and roads being closed off due to flooding in the event of heavy rain. The tow path along the canal is virtually impassable in the winter due to runoff and the lack of a hard pedestrian path and would become even more impassable if used by a doubling of the population or more. How would the additional runoff from a doubling of housing capacity and potential “employment” land be channelled off to prevent problems being exacerbated? How does the new vision for Gnosall respond to likely exacerbation of the existing problems due to climate change?</p> <p><u>Inadequate road infrastructure</u> Apart from mention of road building in Stafford, there is no mention of road building in Gnosall although certain roads, particularly to the north (one of the options proposed) are too narrow to take current traffic so it is unclear how it will cope with a doubling of housing and are currently closed when there has been heavy rain. Furthermore, land for “employment” is likely to mean heavy goods vehicles, which already struggle with getting into the town due to the narrowness of the roads.</p> <p>If Gnosall is to become a commuter town for Stafford, it should be noted that traffic already backs up at the station to a ridiculous extent and not just at rush hours. This problem will be exacerbated by doubling or more housing along the way. Mention is made of road building in Stafford from east to west but no mention is made to improved access to the centre of Stafford where there are significant traffic jams.</p>					

Employment land

With inadequate infrastructure what employment could reasonably be proposed and particularly employment that would not impact heavily and negatively on local businesses that have developed so as not to overburden the existing infrastructure.

Without a specific study of these issues and confirmation from the agencies concerned that the requisite improvements could be made within the period set for the new housing, it is inevitable that the developments proposed will not be “sustainable”.

HS2

Where is the study on the impact of HS2 and the change in housing needs/siting that this will entail?

2. 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 & b, 4.B & 4.C	Other	

2. Please set out your comments below

If the plan is to be future centric, all developments must be built to standards well in excess of statutory building regulations. This should indeed have been the case long ago.

Virtually none of the building under the previous plan was done with proper regard to energy efficiency – virtually no solar panels, ground thermal or the like.

No electrical charging points were placed although it was known that the government was moving to electric cars which would need them.

Little new infrastructure was put in place to mitigate climate change.

This needs to change!

Site should certainly be set aside for wind energy and why not along the canals which serve as wind tunnels?

All possible renewable energy must be used and imposed in the borough at the level of individual houses and commercial buildings and at every other possible level.

Britain’s own gas is unsustainable in the long term and the UK will otherwise become a slave to foreign supply, some from highly unreliable political sources.

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3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.A	Other	
2. Please set out your comments below					
<p>The borough has so far totally disregarded what is needed for sustainable development. Very few of the houses or the like built under the last plan allowed for sustainable energy or led to upgraded infrastructure.</p> <p>The borough needs to do much better. Solar panels and ground energy must be incorporated into all building plans, residential or otherwise and the requisite infrastructure upgrades and building must be incorporated into all plans.</p> <p>A presumption in favour of sustainable development is all very well but surely it needs to be proved not assumed and monitored to ensure compliance.</p>					

4. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5.G	Other	
2. Please set out your comments below					
<p>Question 5.G A new Garden Community that meets the needs that will arise from HS2 and development promised by the Government in the north is required to meet new commuter and employment needs.</p> <p>In this light of this, the major urban expansion approach would seem illogical.</p> <p>Furthermore, the plans in this regard as they concern Gnosall would likely lead to ribbon development rather than serving an identified need? I would therefore rule out options i and ii.</p>					

Given the need for employment around the Stoke area and potential extension of HS2 within the lifetime of the development period, I would suggest a Garden Community to the north of Stafford with easy access to the railway and motorways.

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

Section		Paragraph		Table	
Figure		Question	5.H	Other	

2. Please set out your comments below

I believe that the focus needs to be shifted from what meets the numbers to what development is actually needed at local level.

Areas such as Gnosall are unlikely to “need” major development equating to a doubling of its existing housing and even if it did, it is unlikely to create major employment opportunities.

However, HS2 and its potential development to the north is likely to create a huge need for commuter housing in areas neighbouring mainline stations and motorways.

The focus should therefore shift from minor considerations such as the existence of a primary school and local store to what is needed to ensure economic development and burgeoning employment needs in the borough.

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

Section	5	Paragraph		Table	
Figure		Question	5.1	Other	

2. Please set out your comments below

At least one Garden Development is needed to cater for HS2 and its potential development to the north, which is likely to create a huge need for commuter housing in areas neighbouring mainline stations and motorways.

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

Section		Paragraph		Table	
Figure		Question	5.K & L	Other	

2. Please set out your comments below

Land is clearly needed for employment land but a blanket figure for all areas seems ridiculous.

10-20% of land to be reserved for employment in Gnosall seems unjustified at the present time.

To devote that land to say a superstore or the like would put existing businesses out of business and would create insignificant and low-quality employment. The small and historical nature of the current town centre would mean that any employment development of this kind would turn the town centre into a ghost town.

The existing road infrastructure in and around Gnosall would preclude employment on a large scale in any event.

If greater importance is to be given to the canal system, consideration could perhaps be given to expanding repair and other facilities at Norbury Junction to allow for expansion and training schemes etc but again the road infrastructure is in need of major improvement or alteration before this could happen.

The current criteria for assessing need are again irrelevant to employment needs. Just because there is a primary school does not mean that there is a need for employment land.

With regard to Stafford itself, there are vast areas of "commercial" premises that are unused and in total disrepair. Should these not be returned to standard so that they can be put to commercial use again rather than simply imposing the set aside of employment land. If those premises cannot be returned to gainful employment use, then logically they must be converted to housing to meet the needs that will be required once HS2 comes into operation.

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

Section		Paragraph		Table	
Figure		Question	6.A-K	Other	

2. Please set out your comments below

There are vast areas of "commercial" premises that are unused and in total disrepair in and around Stafford. Should these not be returned to standard so that they can be put to commercial use again rather than simply imposing the set aside of employment land across the board.

If those premises cannot be returned to gainful employment use, then logically they must be converted to housing to meet the needs that will be required once HS2 comes into operation.

Land put to employment use up to now has tended to be in large scale projects such as superstores that create little employment and employment of very low quality.

Land in commercial use in the centre of Stafford does not allow for affordable parking that is required for effective commercial use and is, as a result, turning the centre of Stafford into a ghost town. Why do you shopping, have a meal or explore the sites in Stafford if it is going to

cost you an arm and a leg to park? Why do your shopping in Stafford when there are virtually no shops left in central Stafford and those you need are at the opposite side which means fighting your way through the town centre? Why go to Stafford on public transport to buy things if you have to take several buses to get there, take more business to get from one commercial area to another and take goodness knows how many buses lugging you shopping to get home. Why not go to Newport or the like where you don't have to pay for parking, you just need to take one bus if you are not taking your car and all the shops you could need are more or less within the town centre? Surely this is confirmed by the success of things like Tesco local stores – people do not want hassle of carting heavy shopping bags around when they go out for shopping or to take three or four buses for an evening meal.

There is insufficient detail of what forms of employment are actually needed in the longer term in the individual development areas.

While “warehousing and postal, business support services and health” may be potential growth areas, it is, for instance, difficult to see how these can either be incorporated into or serve a purpose in places like Gnosall.

Moreover, modern means of communication are likely to make major employment dedicated centres less necessary in the long term and, as acknowledged, major manufacturing will find it hard to compete with cheap imports from Asia and the like in the wake of a hard Brexit, quite apart from the environmental impacts.

Perhaps more importantly, the taxes imposed on business for premises are already providing to be too expensive for small businesses to sustain and the figures would seem to suggest that it is small businesses that generate the most jobs overall. Establishing new business sites that are equally unaffordable is therefore counterintuitive!

Would it not in any event be better to reconsider the whole system of business rates. Stafford town centre is currently marked by a rash of charity shops and pawn businesses which contribute little to the character of Stafford and still less to the budget. Maybe it is time to rethink and even look at something totally radical such as taking a percentage of the profit of businesses rather than the current system – the borough could then also assist those businesses to increase their profitability and generate additional employment. This would surely be more positive for employment than the current system of degeneration or simply constructing new sites.

Planning for employment needs to serve a genuine and targeted need, not be vacuous to simply meet the figures!

Again, more thought needs to be given to what HS2 will generate in terms of employment needs.

With regard to superfast broadband, how about ensuring proper mobile phone coverage first!

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

Section		Paragraph		Table	
Figure		Question	6.L	Other	

2. Please set out your comments below

Without affordable parking in Stafford centre and a fight to get through traffic jams, it is difficult to see how visitor numbers could be increased in Stafford.

Equally, the level of business rates precludes the kinds of businesses that would attract tourists being financially viable.

With regard to the canals, a lack of parking, inadequate road infrastructure and ill maintained tow paths make areas like Gnosall and Norbury Junction difficult to expand on from a tourist point of view.

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

Section		Paragraph		Table	
Figure		Question	7	Other	

2. Please set out your comments below

While there can be no objection to developing the centre of Stafford, Stone and Eccleshall, without affordable and sufficient parking, adequate road infrastructure and reasonable business rates, this is likely to be doomed to failure.

Surely this is confirmed by the success of things like Tesco local stores – people do not want hassle of carting heavy shopping bags around when they go out for shopping or to take three or four buses for an evening meal.

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

Section		Paragraph		Table	
Figure		Question	8.A	Other	

2. Please set out your comments below

Clearly the development of brownfield land must take precedence over greenfield land which takes land required for farming and tree planting etc out of circulation, exacerbating climate change.

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

Section		Paragraph		Table	
Figure		Question	8.B	Other	

2. Please set out your comments below

How about a maximum density ceiling?

Much of the housing under the last Plan leaves little room for privacy or protection from noise. Some of the housing for older populations are crammed onto areas where there are the highest levels of pollution although they are one of the populations most vulnerable to such pollution. They are also located in high noise areas although these are populations very sensitive to noise. This can only have a negative effect on the mental and social health of residents.

There is also little sign of density or design reflecting the character of any local areas. How can you preserve local character and a sense of community if everywhere looks the same as everywhere else?

Also, there is a tendency to believe that older populations wishing to downsize want to be crammed into one-bedroom properties. Many more older people are surviving as couples, many of those couples are having to occupy separate bedrooms due to the need for hoists etc. Areas as needed to store things like hoists. All that apart, many expect to be working until late in life and if they are working from home, they need office space. One-bedroom shoeboxes are therefore increasingly irrelevant to downsizing.

Minimum density therefore seems illogical and particularly a blanked threshold or ceiling.

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

Section		Paragraph		Table	
Figure		Question	8.1	Other	

2. Please set out your comments below

A policy requiring bungalows to be delivered on all major developments would certainly be beneficial but if those bungalows are not limited to purchase by the older population and are bought by those with young families, as is often the case, little purpose is served for the housing needs of the older population.

Furthermore, why would the older population downsize to a bungalow if they would have to pay more to purchase a bungalow than they could get from selling their current home.

Most older people enjoy a garden even if they have difficulty in maintaining it. The problem with communal gardens is the heavy charge to be paid for maintaining it, which is not affordable for those with nothing more than the minimum state pension.

However, there is a tendency to believe that older populations wishing to downsize want to be crammed into one-bedroom bungalows. Many more older people are surviving as couples, many of those couples are having to occupy separate bedrooms due to the need for hoists etc. Areas as needed to store things like hoists. All that apart, many expect to be working until late in life and if they are working from home, they need office space. One-bedroom shoeboxes

are therefore increasingly irrelevant to downsizing.

Much of the housing under the last Plan leaves little room for privacy or protection from noise. Some of the housing for older populations are crammed onto areas where there are the highest levels of pollution although they are one of the populations most vulnerable to such pollution. They are also located in high noise areas although these are populations very sensitive to noise. This can only have a negative effect on the mental and social health of residents. Locating such housing in more rural areas, whether in the form of bungalows or complexes would perhaps be more beneficial.

However, there is certainly a need for bungalows to be provided wherever there is an ageing population, urban or rural, but of a decent size and in appropriate locations.

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

Section		Paragraph		Table	
Figure		Question	9.1	Other	

2. Please set out your comments below

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.

Yes to all of these –

How are you to maintain local character if everything is surrounded by buildings and those buildings of just the same architectural design as everywhere. Surely it would be better to ensure that buildings are distanced from historical assets and the like and that any new buildings blend in with those that already exist rather than follow a standard design or two used by developers throughout the borough.

If you take a walk along a disused railway line, or the like, and have views over nothing but

back gardens and roofs, how is this relaxing or stimulating? Moreover, being surrounded by particulates and gases from nearby developments would hardly be beneficial to health!

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

Section		Paragraph		Table	
Figure		Question	9.L	Other	

2. Please set out your comments below

Planning decisions certainly need serious input from the local areas concerned. What is suitable for one area is not necessarily suitable for another if local character is to be preserved and community spirit maintained.

Why does layout and architectural design have to be identical throughout the country? Why not ask the local area where they want green spaces, the size of those green spaces and the use they want them to be put to? Why not ask the local area whether they feel the architecture is right for that area and call for a variety of architectural designs to choose from that might fit the local character more effectively?

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

Section		Paragraph		Table	
Figure		Question	9.M	Other	

2. Please set out your comments below

Why not include green spaces in all developments and ask the local area where they want green spaces, the size of those green spaces and the use they want them to be put to.

This would preserve local character, add to the wellbeing of the local population and increase environmental quality in every respect.

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

Section		Paragraph		Table	
Figure		Question	9.N	Other	

2. Please set out your comments below

Why not include green spaces in all developments and ask the local area where they want green spaces, the size of those green spaces and the use they want them to be put to.

This would preserve local character, add to the wellbeing of the local population and increase environmental quality in every respect.

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

c. Are there any settlements that you believe are lacking in any open space provision? **Much of the City of Stafford**

d. , e., f.: **The standards providing the greatest areas of open space provision should be used. Children and adults need such space if obesity and the like are to be tackled**

h. Do you consider that developments of over 100 houses should incorporate features that encourage an active lifestyle for local residents and visitors (e.g. Play areas, open spaces, sports facilities)? **Yes**

i. Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure? **Yes**

j. Should the Council require all high-density schemes to provide communal garden space? **Yes, with adequate provision for play areas, seating, exercise, dog walking and the like and very careful arrangements to ensure security to prevent such areas being used for drug trafficking and the like, or plants/vegetables that are grown there being robbed.**

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

Section		Paragraph		Table	
Figure		Question	9.0	Other	

2. Please set out your comments below

Yes, the Council should:

a. Seek to designate land within the New Local Plan 2020-2040 to address the Borough-wide shortage of new sporting facilities?

b. Identify within the New Local Plan 2020-2040 the site in which a new swimming pool should be developed?

Rather than looking to place such facilities in city centres, why not look at smaller and more local facilities serving local areas and potentially creating employment. Childhood obesity and an ageing population would seem to favour local facilities that can be visited easily and often rather than major facilities that required logistical nightmares to get to.

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

Section		Paragraph		Table	
Figure		Question	10.A	Other	
2. Please set out your comments below					
<p>Yes, the Council should;</p> <p>a) Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development?</p> <p>b) Ensure all major development is accessible by regular public transport?</p> <p>c) Enforce Air Quality Management Zones around areas of notable biodiversity importance?</p> <p>d) Employ any further methods which you consider will aid in the improvement of air quality within the borough?</p> <p>i) Ensure that public transport moves to electric or equally green transmission.</p> <p>ii) Enforce Air Quality Management Zones in town centres</p> <p>iii) Consider financial assistance or rebates to enable the transition of residential heating to environmentally friendly “green” systems.</p> <p>iii) Assist commercial premises in installing green energy, potentially through rebates</p> <p>iv) Make it obligatory for all new development, commercial or residential to be more or less self-sufficient in energy needs.</p> <p>v) Look at financial assistance or rebates to aid transition to electric vehicles</p>					

20.Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	10.B	Other	
2. Please set out your comments below					
<p>The Council should enforce a scheme whereby any development likely to result in an increase of NO2 depositions in ANY SITES, not just internationally designated sites, in Stafford Borough should contribute to a mitigation programme. Climate change and pollution are crucial everywhere not just the odd designated site.</p>					

21.Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	10.C	Other	
2. Please set out your comments below					
<p>The Council should:</p> <p>a) Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site?</p> <p>b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?</p> <p>c) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford Borough?</p> <ul style="list-style-type: none"> - Require developers to contribute financially and materially to waste recycling plants and facilities. - Require major stores to sort plastics for recycling so that consumers can return to them 					

plastics if they are unsure about whether or not they are recyclable given that the indications used on plastics are often too small to read or illegible.

- Impose a levy on major stores to cover the cost of disposing of plastics that cannot be recycled.
- Impose fines on local businesses in areas where trash they have generated is left lying in the streets.
- Impose fines on motorway service/maintenance companies where motorways are left covered in trash to cover the clean-up costs.

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	LUKE	
Family Name	BURNS	
E-mail address		
Job title (if applicable)		
Organisation (if applicable)		
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.

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Please note:

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- 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		LUKE BURNIS			
Organisation					
1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section	WESTON	Paragraph		Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>LAND ADJACENT TO MY PROPERTY → I AM CONCERNED OF THIS PROPOSED LOCATION DUE TO POTENTIAL 'FLOODING' PLEASE SEE ATTACHED IMAGES...</p> <p>I HAVE EMAILED COUNCIL ASKING FOR DOCUMENTS TO BE MORE PRECISE BUT RECEIVED NO REPLY TO DATE</p>					

1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section	WESTON	Paragraph		Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>I AM CONCERNED ABOUT ADDITIONAL TRAFFICE GENERALLY BUT ALSO IN LIGHT ON EXISTING TRAFFIC DUE TO QUALITY OF ROAD SURFACE & SIZE OF VEHICLES 'SHUDDERING' MY PROPERTY. I HAVE REPORTED THIS AND AGAIN HAD NO REPLY TO DATE</p>					

Please use a continuation sheet if necessary

Land adjacent to these sites across A51



Weston
Stafford Borough Council SHELA 2018
Site ID WE502

Deliverability Summary	
Available:	The site is available.
Suitable:	The site is adjacent to a currently recognised Local Plan settlement.
Achievable:	The site is achievable.
Status:	The site is potentially developable based on the compliance with Policy CS of the Local Plan and Paragraph 71 of the NPPF.

Description:
The site is 13.9 hectares, and is currently used for agricultural purposes.

Availability Assessment
The necessary infrastructure is considered to be available within the locality, but the provision of infrastructure to the site will need to be confirmed with the relevant utility companies. The site has been submitted by a third party, whom has no legal connection to the site whatsoever, and the site is available immediately.

Suitability Assessment
The site is adjacent to the currently recognised Local Plan settlement of Weston. The following constraints exist: Tree Preservation Order, Site of Biological Importance, Historic Environment Record, mineral deposits. A conservation area abuts the site on its northern boundary.

Achievability Assessment
The site is classified as CIL typology RURL, which is considered financially viable.

Weston
Stafford Borough Council SHELA 2018
Site ID WE303

Deliverability Summary	
Available:	The site is available, subject to agreement from the landowner.
Suitable:	The site is adjacent to a currently recognised Local Plan settlement.
Achievable:	The site is achievable.
Status:	The site is potentially developable based on the compliance with Policy CS of the Local Plan and Paragraph 71 of the NPPF.

Description:
The site is 1.6 hectares, and is currently used for agricultural purposes.

Availability Assessment
The necessary infrastructure is considered to be available within the locality, but the provision of infrastructure to the site will need to be confirmed with the relevant utility companies. The site has been submitted by a third party, whom has no legal connection to the site whatsoever, and the site is available immediately.

Suitability Assessment
The site is adjacent to the currently recognised Local Plan settlement of Weston. The following constraints exist: Tree Preservation Order, Historic Environment Record, mineral deposits.

Achievability Assessment
The site is classified as CIL typology RURL, which is considered financially viable.

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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Mrs	
First Name	PAULINE	
Surname	NORTH	
E-mail address	[REDACTED]	
Job title (if applicable)	RETIRED	
Organisation (if applicable)	N/A	
Address	[REDACTED] [REDACTED]	
Postcode	[REDACTED]	
Telephone Number	Please use email	

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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	12	Paragraph		Table	
Figure		Question	12	Other	
2. Please set out your comments below					
Section 12- Connections					
<p>1. My husband and I ([REDACTED]) would strongly approve of improving on the walking and cycling routes in our home town of STONE and use them when we can from our home in the south of the town.</p> <p>2. However, although pretty fit for our ages, we find RECENT SEVERE CUTS TO OUR LOCAL BUS SERVICES, despite more planned housing for the large Aston Lodge estate nearby, (ie. The X1 to Hanley and Stafford, the local bus service to Stone Town Centre and other bus connections) have forced us to now use our car or taxis much more frequently</p> <ul style="list-style-type: none"> • e.g. it’s 1 mile plus walk to our doctors’ or dentist’s surgeries; • It’s a 2 mile walk to Stone Railway Station; • We are forced to drive to County Hospital in Stafford (the X1 used to stop 5 mins from our house and at the hospital) to be sure we’re in good time for our appointments; • We now find it much more difficult to access retail and cultural opportunities in Stoke and Stafford since the only bus service available to us (after more than a mile walk) is the 101. The service has now been reduced to every 30 mins instead of 20 minutes. We were recently nearly late for a very important hospital appointment at Royal Stoke Hospital as 2 consecutive 101 buses failed to turn up in Stone. • We are forced to use the car for our regular food shopping in Stone, and other short journeys if the weather is bad; • We wish to do our bit for climate change and reduce our carbon footprint but are frustrated by the lack of adequate public transport through our part of Stone. We thus also have little opportunity to use the free bus pass we are entitled to...surely a waste of the Council’s and tax payers money! <p>We would like to urge Stafford Borough Council to seriously consider public transport provision and connections for Stone and the surrounding villages in this important Local Plan, especially in the light of your proposals to significantly increase housing in this area. Also, consider the needs of the ageing population. Thank you!</p>					

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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

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NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS
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MR M HARDENBERG E-MAIL RESPONSE & AERIAL VIDEOS

From: Marc Hardenberg [REDACTED]
Sent: 06 March 2020 10:55
To: List-ForwardPlanning-SBC
Subject: Comments regarding New Local Plan 2020 - 2040: Land around Weston

Dear Sir, Madam,

Please find attached our comments/concerns with regards to the New Local Plan 2020 – 2040, especially for the area around Weston.

We have also taken 2 videos, which can be downloaded via the links below. Please note

Aerial video of area on both sides of A518, clearly indicating flop plains:

https://www.dropbox.com/transfer/AAAAAGjnMEbgF2TrYSSndbRXgpBWnZY9q1fhqPEr_ddaGG53WWBtsx8

Video from car driving over Vicarage Bank from A51 towards Gayton, clearly showing all current flooding:

https://www.dropbox.com/transfer/AAAAAEEEx_EqKmeB1R8NOICN1Msrye2b-QfUAiwtIfY517lmLd0ZkXEM

It is well recorded that Vicarage Bank is a high risk with regards to flooding, as Gayton Brook often bursts its banks if the Trent overflows. This results in 1-metre flooding of Vicarage Bank on the first section from the A51.

The middle part of Vicarage Bank is flooded most of the year, as the various streams of the farmland flow over the road.

If you could confirm receipt, that would be most appreciated.

If you have any questions, please do not hesitate to contact me.

Kind regards,

Marc Hardenberg & Julie Ebrey Hardenberg
[REDACTED]
[REDACTED]

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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent's Details (if applicable)
Title	MR	
First Name	MARC	
Family Name	HARDENBERG	
E-mail address	[REDACTED]	
Job title (if applicable)	CEO	
Organisation (if applicable)	—	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

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Part B: Your Comments

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

Name *Marc Hardenberg*

Organisation */*

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

Section	<i>Land East of Weston</i>	Paragraph		Table	
Figure		Question		Other	

2. Please set out your comments below

See separate document and videos.

The evidence clearly shows a very high risk of flooding around Vicarage Bank towards Gayton and on both sides of the ASTO. This makes this site completely unsuitable for development.

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

Section	<i>Land East of Weston</i>	Paragraph		Table	
Figure		Question		Other	

2. Please set out your comments below

The current infrastructure between ASTO, AST and Gayton is very rural and already crumbling with the current flow of traffic. Also for this reason the site is not suitable for development. There are also no schools, shops and other amenities in the area, and no public transport. / limited.

Please use a continuation sheet if necessary

From: Marc Hardenberg [REDACTED]
Sent: 06 March 2020 14:14
To: List-ForwardPlanning-SBC
Subject: RE: Comments regarding New Local Plan 2020 - 2040: Land around Weston

Hi there,

Apologies, I have just been made aware that I have send the same video twice.

Please find below the correct link.

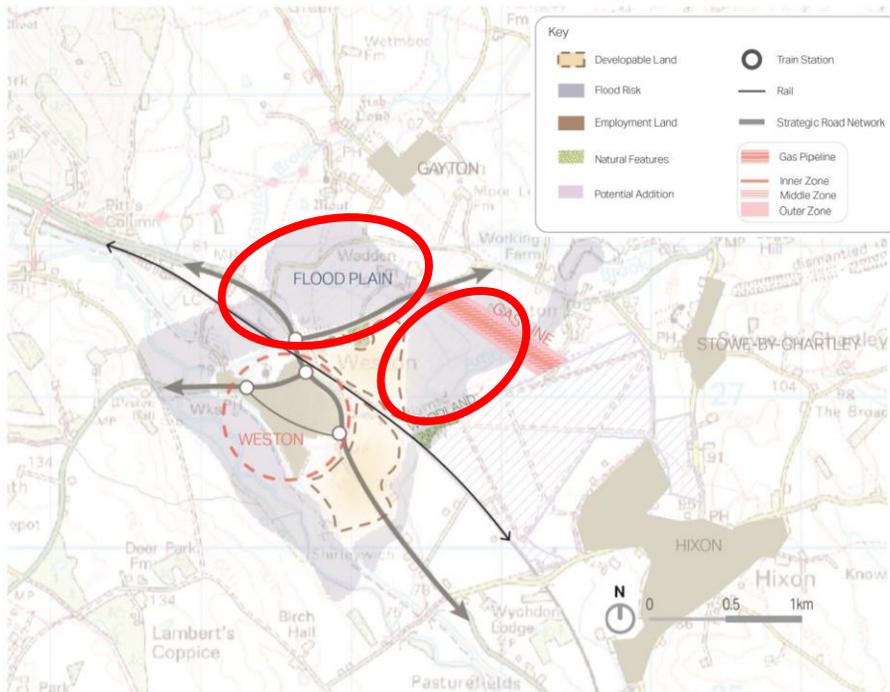
Aerial video of area on both sides of A518, clearly indicating flood plains:

<https://www.dropbox.com/transfer/AAAAAH3NmN2fY2Fx1WDhrQ2iXvKY3t7TdP7qFgg7E3TUYrHoKf02Iwk>

Thanks!

Cheers, Marc

Weston



The development area in the red circles in the image below are clearly indicated as a flood plains on the image on the left.

It is recorded that Gayton Brook is prone to flooding, see examples on page 3 and attached video.

Both images are taken from the same Stafford BC document.

It shows clearly that this area is not suitable for development, due to regular flooding.

Image from Stafford Borough Strategic Development Site Options December 2019
Page 54

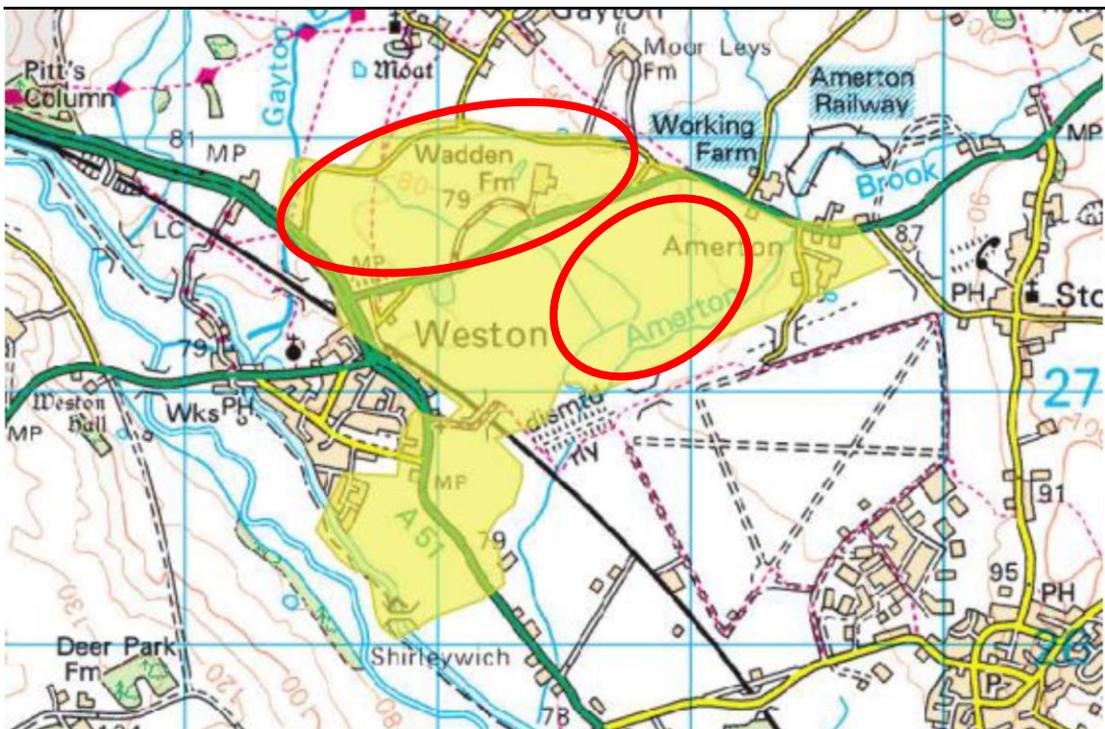


Image from Stafford Borough Strategic Development Site Options December 2019
Page 142

Images of suggested 'Weston' development site



Images taken on 2 March 2020. Area is between A518 towards Hixon and Weston. It clearly shows the flood plans, as already indicated on the map on the previous page.

Flooding of Vicarage Bank towards Gayton



The lane from the A51 towards Gayton, Vicarage Bank, is prone to regular flooding, due to the excess water from the Trent into Gayton Brooks. The article and picture below are from the beginning of Vicarage Bank, but most of the road is under water constantly, see video.

Staffordshire floods: Drivers rescued from stranded vehicles

6 July 2012



Six people had to be rescued from their vehicles as heavy rain caused flooding across Staffordshire.

A bus was abandoned when it became stuck in Gayton, a pub and a school were closed in Stone and Uttoxeter Racecourse was flooded.

Earlier, Staffordshire Fire and Rescue service said it had dealt with 86 flood-related calls since 11:15 BST.

The Environment Agency (EA) has issued flood warnings for Marchington and Picknall Brook at Uttoxeter.

Fire crews rescued a driver who had been trapped inside a bus in water that was 3ft (1m) deep in Wadden Lane in Gayton.

Sheep were also trapped by the floodwater there and crews managed to guide them to dry land.



Fire crews had to rescue a driver of a bus in Gayton when it became stuck in flood waters

Flooding of Vicarage Bank towards Gayton



Pictures taken on 4 March 2020.



MR R PILLING EMAIL RESPONSE – 13 MARCH 2020

-----Original Message-----

From: Rob Pilling [REDACTED]
Sent: 13 March 2020 13:43
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Local Plan Review Proposals...Hixon Airfield.

Good afternoon,

I would be grateful if you could acknowledge and reply please.

What is very disappointing is the document is 183 pages long, how does this allow everyone to have there say without causing confusion.

I make the following points:

- 1.Hixon Airfield is not a brown field site , it is used for crops every year.It has always been farmed for years and years.Brownfield sites should always take precedence over green field sites which the Airfield clearly is.
- 2.The site is a historic former World War 2 Airfield and the area needs to be preserved as such and have the respect it deserves.
- 3.I understand that the proposed exit from this development is out onto Bridge Lane, and the A518. This is clearly not feasible and would present huge risk to exciting traffic flow, the A518 is one of the highest KSI roads in the County, hence I have copied Highways into my reply. You cannot have potentially 3800 extra cars coming out onto a Country Lane.
- 4.Hixon has already had a number of recent housing developments and several ongoing in line with its current "Neighbourhood Plan", this development would more than triple its current size.

Thank you.
Rob Pilling.
[REDACTED]

MR & MRS C SMAILES EMAIL RESPONSE – 16 MARCH 2020

From: Chris Smailes [REDACTED]
 Sent: 16 March 2020 21:35
 To: List-ForwardPlanning-SBC
 Subject: New Local Plan 2020 - 2040 Issues and Options consultation - Response for Consideration

Having attended the exhibition in the Stafford Central Library, my wife and I would like to offer the following response for your consideration.

We have looked at your very comprehensive, detailed and thorough Issues and Options Document (of 184 pages) and we feel that we need to restrict our response to the seven locations under consideration for residential and, where available, employment development in the 2020 – 2040 period.

Land North and East of Gnosall and land between Gnosall and Haughton

- We have concern regarding the increase to vehicular traffic along the A518 between Gnosall and Stafford, particularly with existing traffic travelling at speeds well in excess of the 30 mph limit in Haughton
- We also have concerns that there is insufficient capacity in existing health, education, leisure and retail facilities in Gnosall for the suggested 3,500 and 3,250 new dwellings indicated for this land
- On a positive note, a relatively small allocation of dwellings, say 5%, may possibly enable an early achievement of the nominal 500 dwellings per year required by the new Local Plan within the limitations of the existing infrastructure and health, education, leisure and retail facilities in Gnosall

Seighford – land either side of the B5405

- We doubt that the existing B5405 is adequate for the vehicular traffic generated by a substantial increase of 5,250 new dwellings
- However, 5,250 new dwellings may result in sufficient developer contributions to improvements to transport infrastructure and health, education leisure and retail facilities
- Close proximity to the M6 junction 14 would encourage commuter families, but improvements to public transport would be necessary to align with green travel objectives

Redhill – land north of the Business Park and west of A34

- This location already has very good transport links which include access to M6 junction 14; the A34 dual carriageway north to Stone – including the possible HSR2 station - and beyond; the A34 south to Stafford and to the Beaconside “Stafford northern outer ring road” to avoid town centre traffic congestion to reach the A34 south of Stafford, A518 and A51.
- The occupants of new dwellings on this land may be able to benefit from the improved education facilities already provided to support the MOD families who recently relocated to Stafford from Germany, located adjacent to Beaconside

Meacebrook

- A significant number of new dwellings (11,500) in one location could justify substantial improvements to the transport infrastructure in the area, not only to the A519 but potentially to a new railway station (providing good sustainable access to Birmingham in the south and to Manchester, Liverpool and beyond in the north) and perhaps a new junction on the M6
- The availability of employment land in the immediate vicinity would potentially offer benefits both to the residents of the new dwellings and to others who are able to take advantage of improvements to the transport infrastructure to reach employment in this area
- Development of this land would have minimal, if any, impact on existing village settlements across the Stafford Borough Council area and largely avoid (albeit not relevant in planning terms) NIMBY objections to the development of this land
- The scale of the new dwellings on this land would also support the creation of health, education and leisure facilities in the vicinity, which in turn would provide wider employment opportunities

Hixon

- This land offers good transport links via A51 north to Stone and the possible HSR2 station and south to Rugeley, Lichfield, Tamworth and M42
- The availability of land for employment would not only benefit the residents of the new dwellings but residents of Rugeley, a town that historically relied on coal mining

Land east of Weston

- The residential development of this land along with opportunities to provide new employment opportunities could share the benefits associated with the land at Hixon noted above
- If the land at Hixon and the land east of Weston were considered together, the combined number of new dwellings (2,750 + 2,000) may generate coordinated developer contributions to the benefit of both areas of land

We hope that our observations set out above will be of interest to you and we look forward to taking part in the next phase of consultation on the new Local Plan 2020 – 2040.

Kind Regards,

Tress and Chris Smailes

MR D HOLT EMAIL RESPONSE – 16 MARCH 2020

From: DAVID HOLT [REDACTED]
Sent: 16 March 2020 11:41
To: forwardplanningconsultations
Subject: Local Plan Review Issues and Options

Sirs,

With regards to the above named document which at 180 plus pages is impressive but potentially too much for a lot of readers to sensibly respond to all the questions included therein.

Some comments are as follows:

Section 3:

The general concept of a "range of housing types" would appear sensible.

However this plan does not appear to take much account of existing Neighbourhood Plans despite the efforts on consultation done by the parish councils etc. These plans should be of a TOP priority in any Borough Council plans.

Section 4:

All councils MUST take into account the Government directives in this respect. (if not taking them even further)

Thus the consideration of a "New Garden Village" on Hixon WW2 airfield and the expansion of Weston as proposed would seem to conflict with some aspects.

The proposal would require major changes to the road network which already quite busy. Being the main link between Stafford and Derby etc.

The majority of any new houses would be expected to have at least two vehicles (thus 4 to 5 thousand extra vehicles) as most employment is outside walking or cycling distance of Hixon.

Even if the move to no-fossil fuel being pushed by the government does happen it will be many years before they force the use of existing transport to change.

Public transport however much we would like it is never going to be successful enough to stop the use of private transport.

Also as climate change is expected to create more instances of extreme weather. The building of a complete new "village" approximately 3 times the size of Hixon (but not really part of Hixon, Stowe or Weston) on low lying ground which is already subject to flooding would seem to be contrary to government recommendations.

Section 5:

There should be more emphasis on the distribution of housing around the borough to ensure fair distribution of new housing which is sustainable and a positive contribution to existing communities.

Why is the site for the housing development on Hixon airfield incorrectly defined as "within the Recognised Industrial Estate Boundary"

Also the potential garden village will not satisfy the BC objective set out in section 4.

Section 8:

Flexible housing density should reflect different locations. eg. greater density in Town centres than in rural locations.

General:

There may well be other aspects of the BC local plan which require further consideration. However with the size of the document and the time to respond it is not possible identify all of them.

I trust that the above comments will be taken into account as part of the review and not just ignored they do not agree with what you want to do.

Regards

**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	Paul	
Surname	Beardmore	
E-mail address		
Job title (if applicable)		
Organisation (if applicable)		
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 Paul Beardmore		Organisation			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	3	Paragraph		Table	
Figure		Question	3 C	Other	
2. Please set out your comments below					
<p>Completely support the need to focus more heavily on the way which the local plan can positively combat the effects of climate change and move towards zero carbon credentials.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	3	Paragraph		Table	
Figure		Question	3F	Other	
2. Please set out your comments below					
<p>The key objectives for areas outside of Stafford and Stone requires a plan to support the aging populations within villages around the borough. Either with the introduction of more infrastructure to smaller villages or the introduction of small scale developments to bring in a younger generation which would balance the age demographic and create rounded more self-sufficient communities, which are not regressing.</p>					

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	Other	
2. Please set out your comments below					
<p>a) Yes, the level of energy efficiency of new developments should be far in excess of building regulations .</p> <p>b) All new builds should be built to a passive house standard</p> <p>Solar panels/ solar tiles should be compulsory to all new builds and should generate the required kW for the house type.</p> <p>Larger developments should have communal ground source heating.</p> <p>All new developments should be assessed for their annual Co2 output, a tree plantation scheme could be rolled out to offset the Co2 of the new development, paid for by the developer, supported by local farming.</p>					

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 B	Other	
2. Please set out your comments below					
<p>Solar panels and ground source heating for new housing and industrial developments.</p> <p>Biomass, ERF's and wind</p>					

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	4C	Other	
2. Please set out your comments below					
<p>Yes, all new domestic developments should aim to be completely self-sufficient from a power and heat production perspective.</p> <p>Larger industrial developments should be encouraged to offset Co2 and generate electricity for their own needs.</p>					

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	4D	Other	
2. Please set out your comments below					
<p>Yes, locations to be based off a wind survey and infrastructure assessment for site viability</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5A	Other	
2. Please set out your comments below					
a) No, a higher level of emphasis should be placed upon the environmental credentials of a development as opposed to its geographical location within the settlement hierarchy.					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5D	Paragraph		Table	
Figure		Question	5D	Other	
2. Please set out your comments below					
i) Yes					
ii) Yes, smaller settlements should be included within the hierarchy to allow natural growth and prevent an aging and potentially isolated population stagnating. The lack of potential investment in these areas will create future economic burdens.					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5F	Paragraph		Table	
Figure		Question		Other	
2. Please set out your comments below					
b) intensification of towns and district centres, if the road infrastructure is not suitable ie Stafford.					
c) Wheeled settlement cluster, which will enable development in smaller locations as well as the main hubs. This will ease traffic in the main hub and breathe life into surrounding settlements, which in turn will create a more diverse landscape of development.					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5G	Other	
2. Please set out your comments below					
<p>I do not feel garden communities is a suitable development strategy unless it was a Brownfield site. Housing supply should be focused on infill smaller scale developments to prevent large expanses of productive agricultural land being lost. The proposed garden community locations should be assessed as new woodland or environmental sites to lower Co2, aid with flood management and increase biodiversity in the borough.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5H	Other	
2. Please set out your comments below					
<p>i) Yes, but with more support towards development ethos 3.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5l	Other	
2. Please set out your comments below					
<p>No, Housing supply should be focused on infill smaller scale developments to prevent large expanses of productive agricultural land being lost. The proposed garden community locations should be assessed as new woodland or environmental sites to lower Co2, aid with flood management and increase biodiversity in the borough.</p>					

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	Other	
2. Please set out your comments below					
<p>Yes, brown field sites should be more favourable than new green field developments for housing, industry and environment projects.</p>					

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	8B	Other	
2. Please set out your comments below					
<p>A range of housing densities should be implemented and reflect the surrounding historic developments, to prevent irregularities within settlements and spoil character.</p>					

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	8L	Other	
2. Please set out your comments below					
<p>No, affordable housing should not be included on small scale developments in rural areas, unless they are in keeping with the settlements identity.</p>					

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	8N	Other	
2. Please set out your comments below					
<p>b) Custom built homes should be allocated through the borough on small scale developments so that the architectural merit is evenly spread. As custom build homes are aimed at individually, the plots must also reflect this and therefore would lose appeal on larger scale development sites.</p>					

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 O	Other
2. Please set out your comments below				
<p>a) Yes, it is paramount that rural communities are revived with small scale sympathetic developments to aid in shifting the age demographic.</p> <p>b) Yes, developments and self builds in these areas should be aimed at individuals looking at long term residency to prevent a build and sell ethos. People with connections to the surrounding area or rural industry should be able to reside in their ancestral locality and enable organic settlement growth. The current policy prevents nature rural settlement growth, drives out the younger working generation and solidifies an aging demographic.</p>				

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	9E	Other
2. Please set out your comments below				
<p>No, a greater emphasis should be placed upon planting trees in low grade agricultural land, new developments should have a mandatory Co2 offset scheme to aid with additional tree cover. The farming community should be encouraged to increase tree cover and hedge row density.</p>				

lease 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



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

17 March 2020

Dear Sirs

**Re: New Stafford Borough Local Plan 2020 – 2040:
Issues and Options Stage Consultation**

I attended the recent consultation event in Stone and have subsequently downloaded a copy of the Issues and Options Consultation Document February 2020. I have read through the document carefully and would like to comment on the following issues.

Question 5.F
(a)

I agree the six scenarios you have put forward are an acceptable spectrum of the alternatives.

(b)

I consider the establishment of Garden Communities is the least favourable option. I seek to justify my comment with the following:-

- Unless there are high quality transport corridors currently available, with abundant spare capacity, the resulting impact on the existing community will be discordant and very disruptive. The transport links for a large Garden Community, of say 1,000 homes plus, must include A class road connections to the Borough's principal settlements, incorporate provision for a new railway station (or holt), be close to enough existing employment areas and close to a motorway interchange.
- The impact upon the local environment during the construction period, and post completion stages, would be extremely detrimental and it is difficult to see how man made environmental gains could offset the negative impact. Telford is a typical example where the quest to design-in environmental gains has led to wasteful and disproportionate areas of unused land, a community with no social identity, and a community fraught with social problems.
- A new settlement of the type being considered would take a long time to be delivered and, more importantly, would need huge reserves of capital investment in order to pump prime the levels of infrastructure that would be needed to make the development sustainable. This initial financial front loading would be needed before the first phases were occupied. The investment would

have to provide new road networks, upgrades of existing networks, new schools, health centre and local services. All of these would need to be built and functioning. In addition, the electrical sub-station, water and drainage services designed and built to accommodate the whole proposed Garden Village would be required at day one. It could not be done on a piecemeal footing.

Paragraph (c)

I suggest the best option is a combination of the other five spatial scenarios. I give the following reasons:-

- Some minor intensification of Town and District Centres is easily justified because it doesn't require massive investment in infrastructure.
- Dispersal of development allows greater integration into the existing communities and helps to support local shops, schools, pubs and bus services. This type of development is also quickly delivered and responds to a strong market demand.
- Intensification around the edges of larger settlements integrates quickly into the existing transport facilities and minimizes the use of motor cars to access central services.
- String Settlement and Wheel Settlement Clusters, if promoted around the periphery of Stafford, could contribute to the provision of a development led Stafford Ring Road, thereby helping to relieve current levels of traffic congestion.
- All five scenarios centered upon the two principle settlements of Stafford and Stone would help to address the continued decline of the respective High Streets.

Question 5 (g)

I do not consider the utilization of a new Garden Community/Major Urban Extension will be helpful in determining the approach to future housing and employment land provision.

Question 5 (h)

(i) I agree the only NPPF-Compliant Growth Options proposed by your document must disregard options one, two and four, as they are contrary to NPPF.

In the event option five were to be adopted, and a new Garden Community contemplated, very careful consideration must be given to the off-site infrastructure required to make a large mass of housing work within an otherwise rural area. Here I am thinking particularly of the possibility of such a community being established at Meecebrook.

The capacity of the Meecebrook community is stated at paragraph 5.7 to be estimated to provide 9,000 – 11,500 homes and 8,000 – >15,000 jobs, whereas option five indicates the anticipated requirement to be only 3,000 homes. However, even just 3,000 homes in the one location at Meecebrook would present innumerable difficulties in connecting the

development to the surrounding major settlements of Stafford, Stone, Newport, Newcastle-under-Lyme, Stoke-on-Trent and Wolverhampton. The existing links to Stafford are already at capacity through Eccleshall and/or Norton Bridge, the traffic island on the A34 at Walton, Stone was stated to be beyond capacity many years ago, and the A519 at Junction 15 on the M6 Motorway is overloaded at peak times of the day. Add in the disruption that will be caused by the construction phase of HS2, and the railhead to be located at Yarnfield, and the prospects of a satisfactory delivery appear very unlikely.

I do not think growth option six: Concentrate Development Within Existing Transport Corridors/Clusters of Communities, is appropriate as it creates ribbon development across the rural area which has been an anathema to town planning since its inception.

Question 5.1

For the reasons given in the foregoing paragraphs I do not consider 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.

I trust that you will find my comments helpful.

Yours faithfully

A large black rectangular redaction box covering the signature area.

J C HINSON

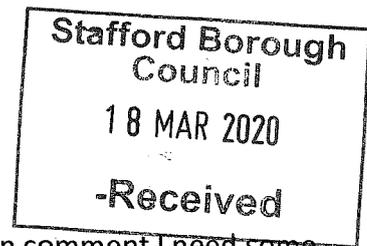
New Stafford Borough Local plan 2020-2040; Issues & Options Stage Consultation

Brian Wiseman <[REDACTED]>

Sun 15/03/2020 20:30

To: forwardplanning@staffordbc <forwardplanning@staffordbc>

Dear Sir,



With reference your letter dated 31 January regarding the above; before I can comment I need some clarification on the land I own off the High Street; Gnosall.

In January 2018 I submitted information, for the land to be included as a site for future infill development. The total site area is 1 1/3 acres and I submitted proposals for the rear portion (approx 1 acre) as a site available for future development.

To date I have not heard anything from yourselves; as to the outcome. Could you please confirm any outcome and how together we can move things forward.

I look forward to your response

Yours faithfully

Brian Wiseman.

**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	Luke	
Surname	Serjeant	
E-mail address	[REDACTED]	
Job title (if applicable)		
Organisation (if applicable)		
Address	[REDACTED] [REDACTED] [REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

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

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

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

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

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- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

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	5	Paragraph	5.6	Table	5.3
Figure		Question	5. D ii	Other	Appendix 1
2. Please set out your comments below					
<p>The table shows that Eccleshall has seen a 27% growth in the settlement 2011-2019 as at March 2019. It also shows that 340 dwellings have been granted as of that date. The dwellings per annum (dpa) (Appendix 1) shows that Eccleshall’s share of the dpa for Stafford Borough equates to 15 dwellings per annum (3.61% of the total of 408 dpa for Stafford Borough). This means that Eccleshall would have been expected to have had 135 new dwellings over the entire period, far fewer than the 340 actually delivered. You will be aware that further applications for dwellings have also been granted or are under consideration since March 2019. This figure is significantly higher than any of the other Key Service Villages. This disproportionate growth has put the community of Eccleshall under considerable strain in relation to services and facilities and volume of traffic.</p> <p>I feel that in the next Plan this imbalance needs to be addressed and the proportion of new housing required in Eccleshall should be significantly lower than in other Key Service Villages and areas across the Borough. Eccleshall Parish Council should be enabled and supported to produce a new Neighbourhood Plan which allows for a rebalancing of the housing requirement. In order to achieve this, it may be necessary to include some smaller settlements not included in the list of Key Service Villages. (Question 5.D ii)</p>					

Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph	5.33	Table	
Figure		Question	5.G	Other	12.8
2. Please set out your comments below					
<p>Whilst I am not against the idea of Garden Communities, I am concerned about the impact the scale of such developments could have on existing communities. Eccleshall already has significant problems with heavy goods lorries cutting through the centre of Eccleshall on roads not designed to cope with lorries of this size (see also 12.8). The prospect of many more large and heavy vehicles coming through Eccleshall in order to facilitate the development of a Garden Community at Meecebrook (Para 5.4 Option v.) is alarming and I would ask that the highway infrastructure to</p>					

support such a development is developed at the start of the project if this is the selected option (Para 5.35 Bullet point 4). If the proposals will not include a new Junction onto the M6 then I would argue that the most sensible location would be the area between Stafford and Stone (Para 5.4 Option iv) which would benefit from proximity to Junction 14.

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

Section	5	Paragraph	5.6	Table	
Figure		Question	5.H	Other	

2. Please set out your comments below

I would support Growth Option 5 recognising that the Garden Community housing contribution would not commence until 2030. I believe the current plan demonstrates that the 5-year supply can be met during the period until 2030.

Growth Option 6 should be discounted, as I do not believe that the ‘string’ approach would be sustainable nor achievable because of the traffic implications on routes forming the ‘strings’ (See also 12.8). This would leave only Option 3 and 5 as NPPF compliant. Option 5 gives the most flexibility in my view.

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

Section	5	Paragraph	5	Table	
Figure		Question	5.I	Other	

2. Please set out your comments below

I do agree that consideration of a Garden Community should be incorporated into the plan, as I am unconvinced that existing communities (infrastructure and facilities) could cope with the additional housing requirements over the whole plan period.

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.Q	Other	

2. Please set out your comments below

It is not clear from the description in relation to the development of settlement boundaries whether Neighbourhood Plans will continue to form the basis for Settlement Boundaries. Existing boundaries had to be agreed through a referendum of the people within the designated area. I would hope that the principle of involving the local community in the development decisions within their local area is not being abandoned.

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

Section	7	Paragraph		Table	
Figure		Question	7.A	Other	

2. Please set out your comments below

If the Eccleshall Local Centre is included, then the problems of traffic congestion must be recognised, and solutions found to reduce the negative impact of this for Eccleshall and detract from the desirability of the centre for shopping or recreational purposes. A review of car parking options is needed.

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

Section	7	Paragraph		Table	
Figure		Question	7.B	Other	

2. Please set out your comments below

All of the area North of Stafford Town Centre (ie North of the Town Hall/Market Place) is in real need of regeneration. Since the construction of the new shopping mall, retail in this area has ‘died’ with many shops and units closed. The area running right up to the Greyfriars estate is, quite frankly an embarrassment and gives a terrible impression of Stafford to anyone entering the town from Junction 14 of the M6. This whole area desperately needs investment.

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

Section	8	Paragraph		Table	
Figure		Question	8.A	Other	

2. Please set out your comments below

Yes - the use of brownfield sites should be given priority over greenfield sites.

Please use a continuation sheet if necessary

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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

MS A HINDLEY EMAIL RESPONSE – 18 MARCH 2020

From: Anna Hindley [REDACTED]
 Sent: 18 March 2020 19:42
 To: forwardplanningconsultations
 Subject: Response to Strategic Housing & Employment Land Availability Assessment (SHELAA) 2019 Update

To meet the present requirement for housing Stafford Borough Council has established a Sustainable Settlement Hierarchy with Stafford at the top, taking the bulk of development, followed by Stone, then Key Service Villages (KSV) and finally the rural areas. The KSVs are villages that the Borough Council believe have the capacity to deliver sustainable communities and limit the need to travel to Stafford and Stone. Two KSVs have been identified in Colwich Parish. They are Gt. Haywood and Lt. Haywood/Colwich.

This hierarchy identifies 11 key services, 2 of which are Gt. Haywood and Colwich/Lt. Haywood. The total housing allocation for all eleven KSVs for the Plan period was 1,200 houses. In calculating the potential for sustainable development in Colwich Parish the decline in its facilities has been taken into account in the Neighbourhood Plan

New legislation brought in by the Localism Act 2011 seeks to enable communities to come together to shape the development and growth of their local area through the production of a Neighbourhood Plan. The Colwich Neighbourhood plan was adopted in 2016.

General objections to further development in the parishes of Great Haywood and Little Haywood:

The villages have very little employment and what there is, is in the service industry. There are two non-retail employment areas in Gt. Haywood, none in Lt. Haywood, one in Colwich and one in Wolseley Bridge. All of these are minor.

One aim of the local plan was to reinstate a settlement boundary around villages allowing for inclusion of small developments, to ensure that villages keep their separate identities. It also aims to define opportunities for small-scale housing development to allow local people to stay in the villages whilst retaining the rural character of the Parish. It aims to achieve this whilst protecting and enhancing the green spaces separating the villages to safeguard and improve biodiversity by avoiding the fragmentation of habitats and by maintaining, restoring and creating wildlife corridors and enhance the visual character of the villages. It also aims to encourage sustainable development by managing flood risks, minimizing traffic and encouraging appropriate renewable energy generation that does not damage the local environment

Over the years the villages have seen significant increases in traffic volumes caused by previous housing developments. The majority of residents already commute out of the villages on a daily basis. There are also safety concerns about the number of cars using narrow, rural lanes such as Coley Lane and Little Tixall Lane.

With so much of the AONB in Colwich Parish, some of the Key Issues affecting the management of the AONB are especially pertinent to the Parish. These include: KI6 Pressure for development, its quality and impacts may change the character of the AONB landscapes and its setting. KI7 Encroachment of urban elements into landscapes. KI9 The development of major new housing provision immediately surrounding the AONB may significantly increase the impact of regular visitors to localised areas. KI12 Field patterns and habitats continue to deteriorate due to lack of hedgerow maintenance. KI13 Maintaining historical features within the landscape. KI15 Protection and enhancement of biodiversity and geodiversity is essential to the landscape. Connections need to be made between the biodiversity and geodiversity within the AONB and the landscapes surrounding it. KI18 The increasing impact of visitors on designated sites, such as the Special Area of Conservation(SAC), means greater pressure on other areas and implies greater needs to manage their visits. KI21 Maintaining views from and into the AONB.

Specific objections to 3 identified sites.

Site Names: Land adjacent to Shenley Cottage, and Stone House Farm, Little Haywood as well as Land at Little Tixall Lane, Great Haywood,

These areas are all designated in the document as available, suitable and achievable. I am raising my concerns against all of these sites, which are geographically close or overlapping – and all form the division between the 2 villages.

This land forms part of the medieval field system which includes neighbouring fields to the south and north. Although somewhat degraded the field has remnants of strip cultivation. The field is crossed by two Rights of Way, FP46 and FP47 which give walkers access between Lt. and Gt. Haywood and the Jubilee Fields recreation ground.

Anecdotal evidence suggests that the hydrology of the higher parts of the Parish between the two villages is complex and the Village Design Statement warns of the dangers of development in this area.

The described land is outside the settlement boundary of the Colwich and Haywood plan, part of the plan adopted by Stafford 2011-2031.

The fields identified in the document identified by above names act as a buffer

between Great and Little Haywood, allowing them to retain their separate identities and rural feel.

These meadows are of importance both historically and ecologically. They also act as a natural sponge, soaking up excessive amounts of rainwater, any building will inevitably lead to even more flooding in Little Haywood.

The status of these villages as an area of outstanding natural beauty will be lost, as they would effectively become a conurbation, especially when considering the planning applications already granted for the building of 76 dwellings on adjoining field.

The infrastructure and local services would be inadequate to support the needs of the much larger population.

With specific regard to both the desirability of preserving the setting of the wall to the estate of the Grade 1 listed Shugborough Hall and the impact of the identified areas on the Colwich and Little Haywood and the Great Haywood and Shugborough Conservation Areas are potentially extremely detrimental.

I think that for 2011 and 2031, the "key service villages" were obligated to provide 1200 houses across 11 key service villages. "In the spirit of localism the Borough Council chose not to apportion this 1,200 nor to specify any methodology to apportion the housing requirement between KSVs."

Great Haywood and Little Haywood/Colwich form 2 KSV. My research suggests that G/Haywood has had 318 new dwellings and, L/Haywood/Colwich 22, totalling 340, or over 28% of the total obligation for all 11 villages. I believe there are some outstanding approved plans yet to be built. It is quite difficult to get the latest figures, but it seems that the 2 KSV have contributed over and above any expected development already.

The total new dwellings in all 11 KSV is already 1396. As of March 2019.

Any development of the above parcels of land would be in complete opposition to the stated aims of our local plan, which should be held in high regard in planning matters.

This land has been designated as suitable in the document, because it *borders* the boundary of the plan. I would like to raise an obvious objection that the development in the parishes should be within, not ADJACENT to, the boundaries stated in our hard won plan.

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

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

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

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

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

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

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

Please note:

- Comments must be received by 12noon on Tuesday 31March 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	5	Paragraph		Table	5:3
Figure		Question		Other	
2. Please set out your comments below					
The table indicates that 167 homes were built in Gnosall during the last phase whereas it was in fact nearer to 200. This is more than 9% as indicated in the table.					

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	51	Other	
2. Please set out your comments below					
In principle the concept of a Garden Community is good – rather than just creating housing estates with no in-built facilities. However, Gnosall does not have the infrastructure to support a build of the size included in the proposals. In particular, losing the boundary – and farm land! –between Gnosall and Haughton would, in my opinions, lead to a loss of identity for both villages and a loss of community spirit. The A518 is a busy road and further access from a large residential build would be disastrous. There would be a loss of 2 villages and the emergence of a huge conglomerate with no sense of identity or responsibility, I have lived in Gnosall for 26 years and love it – but there is little parking, limited community facilities and no space at the school for further admissions so a Garden Community would not be in integrated one but a bolt-on.					

Please use a continuation sheet if necessary

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

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Forward Planning Team,
Stafford Borough Council.

19/3/20.

New Stafford Borough Local Plan 2020-2040.
Hoson Airfield

I am writing on behalf my husband and myself, we disagree with the above local Plan regarding Hoson Airfield. It is outside agreed boundaries. We would like to make the following comments:-

- ① This is good agricultural land. Since the war finished and the R.A.F moved out, it has been farmed continuously. once 150 dairy cows also sheep grazed the land in the centre of the airfield, 40 acres of potatoes grown yearly and latter years arable crops.
- ② The roads in this area are country lanes and dangerous with heavy traffic which also serve Hoson Village and three industrial sites. The junctions of New Road and Church Lane with A 51 are lethal, and between 4 pm & 5:30 pm the traffic is queued for long distances.

③ The ground is not well drained, so where will all the storm water go?

Therefore I conclude by reiterating our strongest objection to this local Plan, to build over 2,200 houses on Hiscox Airfield.

Britain is getting short of Agricultural land.
Yours Faithfully

[Redacted signature]

Stafford Borough
Council
30 MAR 2020
-Received

MS H CHARNAH EMAIL RESPONSE – 21 MARCH 2020

From: Hazel Charnah [REDACTED]
Sent: 21 March 2020 17:18
To: forwardplanningconsultations
Subject: Local Development Plan - Hixon parish

Dear Sirs

I am writing to express my objection to the 2020-2040 development proposals for additional houses and commercial/industrial property in the Hixon/Stowe-by-Chartley/Weston area.

These currently are all small villages which are separate and have their own character; I see no convincing reason to change this. Hixon has already grown by 24% in the last 10 years.

Climate change - The garden village proposal would destroy the character of these villages and together with the other proposed developments could potentially quadruple the number of houses. Importantly, there would be a significant increase in the number of cars using the roads which would result in higher air pollution and increased noise levels. Currently very few people use the local bus service (I speak as a regular passenger) and those who do are predominantly students and pensioners. I cannot see that an increase in population would in any way encourage either new or existing residents to make better use of public transport (they don't where the new houses have been built along Hydrant Way and nearby). Would this housing be aimed at the working population (where would they work and how would they travel there?) or retired people (where would additional accessible medical facilities and shops be sited?)

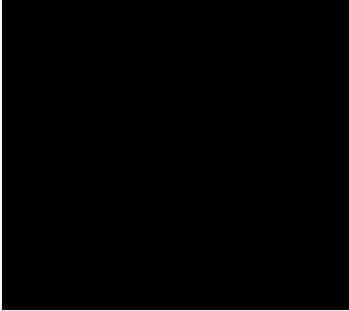
Economic prosperity – additional commercial and industrial development I believe would not significantly benefit local residents in terms of employment but would result in an increase in traffic as most (including local) employees would drive to work and there would also be an increase in the number of commercial vehicles, further adversely affecting air quality.

Taking exercise by walking along the lanes between Stowe-by-Chartley and Hixon (as I and several other local residents regularly do) is already potentially dangerous, especially where there are no footpaths, as the majority of drivers pay no heed to speed restrictions, the fact that they cannot see who or what is round the next corner, or the safety and comfort of cyclists/pedestrians/children/dogs. Additional traffic, an inevitable result of any development, would increase such danger.

A huge amount of new housing has very recently already been built on the edge of Stafford on greenfield sites and where manufacturing facilities have been demolished and this development is continuing. Surely this is sufficient to meet Stafford Borough's requirements. I wonder where all these new residents work and to which local economy they contribute and where all the additional support services – schools, hospitals, police etc – are.

To conclude, I care passionately about where I have lived and enjoyed a quiet, friendly village community life for 36 years and do not wish for the character of Hixon/Stowe-by-Chartley to be changed forever by further (in my view unnecessary) development.

Hazel Charnah



MRS F BRAMALL EMAIL RESPONSE – 24 MARCH 2020

From: Francesca Bramall [REDACTED]
 Sent: 24 March 2020 17:14
 To: forwardplanningconsultations
 Subject: Hixon Local Development Plan

Hello

I would like to put forward my concerns about any housing or other developments on Hixon Airfield, as shown to local residents at the Hixon public meeting on 29th February and mailings to our house of the proposals in the Hixon Parish Council newsletter.

Traffic:

My family live at the crossroads in Stowe-by-Chartley - on Bridge Lane where there are plans to build an access road to new houses on the airfield. This is concerning because Bridge Lane is a single track lane with poor visibility for oncoming traffic particularly over the bridge and at the bend in the lane. This lane is icy in winter because of the poor water drainage on the bend - the water comes out of the field and the drain gets blocked by the path to the airfield. The same thing happens at the end of Bridge Lane just before the A518. Dog walkers park their cars here all year round by the path to the airfield, churning up the earth verge.

No widening of the lane would be possible at the crossroads unless at least 2 of the four houses and gardens were altered significantly, one of them being ours.

With the possibility of two cars per household and the resulting increase in traffic particularly between Bridge Lane and Stowe Lane to Hixon, if any housing development went ahead this would significantly increase the traffic and pollution outside our houses.

The houses at the crossroad, and particularly ours is only one and a half to two meters away from traffic going along Bridge Lane. At the moment there are shudders throughout the house caused by larger vehicles using the lane. We have had vehicles going into our hedge and drivers are confused about which way to go around the tree at the junction. The slightly wider piece of lane outside our kitchen window is already a bottleneck, where vehicles are waiting for traffic coming up Bridge Lane to the crossroads. Any construction traffic would impound this.

The junction of Bridge Lane and the A518 has always been an accident spot. I have had someone go into the back of me before whilst I was waiting and indicating to turn off the A518 and turn into Bridge Lane. There is a dip in the road towards Uttoxeter which reduces the visibility of oncoming cars from that direction. The Bridge Lane turn off is also on a bend just past Amerton, but not many drivers slow down for this part of the road and I can imagine some drivers forget to indicate. It is historically a road where drivers go very fast, especially motorbikes which you can hear revving up and racing along the straighter and bendy parts of the road from our

house. There has been a speed warning sign put up just past the old garage on the hill to warn drivers of the dangers of driving too fast.

The traffic queues up at the end of Bridge Lane every night anyway, with workers from the airfield leaving to go home. There is always a longer queue at the other end of Hixon with cars and vans going onto the A51.

We have lived here for 20 years and noticed the increase in traffic at the crossroads as the number and size of businesses at the Hixon end of the airfield have grown. I can tell when it's 4.30/5pm going home time from inside our house by hearing to the volume of cars and vans passing.

On one occasion there was very heavy snow blocking the end of Bridge Lane for a couple of days. The snow had drifted up the sides of the hedge and two cars were abandoned there. There was no way it could be cleared by hand with a spade. On the same occasion the snow blocked Station road coming into the village and left only one narrow path to drive along for a few days once the least affected side had been cleared. With both of our main access roads blocked to Stowe, it would have been impossible for an emergency vehicle to get through.

There is lots of traffic from the Uttoxeter direction increasingly going through our village onto Hixon, either to work on the airfield or as a short cut to Rugeley. The local bus uses the same narrow lane and all traffic has to negotiate the bend in the road near the village hall. An increase in traffic will also impact users of the village hall, especially when exiting the car park and looking in either direction to turn out - with a hill to the right and bend in the road to the left.

The Effect on Stowe-by-Chartley Residents:

Stowe by Chartley is what you may call a perfect small village. There are many elderly resident whose children went to the village school up until the 1970's and still live in the village.

We can drive to a local shop in Hixon, the doctors in Great Heywood, the hospital is a 10-15 minute drive away, and there is a bus service through the village. All these proposed houses will ruin the reason and experience of why we live in Stowe-by-Chartley.

There will be more traffic through the village, frightening local people walking along an already narrow pavement which does not even stretch along the whole village.

When there is a service at the church, people park their cars directly outside, an increase in traffic will make this more hazardous and cause a bottleneck at either end of the parked cars.

There will be more litter also.

Dog walkers will have to face more traffic and it will become more dangerous to walk with incomplete paths throughout the village and none along Drointon Lane. Horses use our lanes too, more traffic would be most dangerous to them and their riders.

Wildlife:

I am a keen wildlife photographer and member of Staffordshire Wildlife Trust.

We have great crested newts in our pond and also around our and probably our neighbours gardens.

I have seen the ground at Hixon airfield change over the years from when there was still tarmac runways. As many locals will say it has been and still is a lovely place to be - and walk - and see nature at its best because at the moment it is relatively undisturbed.

I can name at least seven species of butterflies and moths, plus beetles and insects and mammals that are resident on the airfield.

With the birds there are the skylarks which nest in the surrounding fields and are a joyous representation of untouched landscape (present from February through Summer), also kestrel, wheatear, little owl, buzzard, warblers in the surrounding scrub and trees and red legged partridge, plus more I have no doubt.

With regard to mammals there are fox, hare and rabbit. There are rabbits along most of Bridge Lane with burrows in the verges. All this natural habitat will be lost if the airfield is developed for housing.

Butterfly species present: peacock, small skipper, small copper, common blue, speckled wood, 5 spot burnet, the whites. I have pictures of these.

Beetles and other insects, ladybirds, reg-legged shield bug, thick-legged flower beetle, spiders. I have pictures of these too.

If there are no longer any crops on either side of the old runway there will be no insect food or seeds for the birds to feed on and no safe nesting sites for ground nesting birds.

Wildflowers varieties include ox-eye daisy, bird's foot trefoil - an important food source for butterflies, field poppies, thistle, vetch, bistort, black medick, common fumitory, self heal, wallpepper, clover, grasses and shepherds purse.

Crops include wheat, oil seed rape.

In summary there would be so much disturbance and loss to the residents of Stowe-by-Chartley for a very long time if any houses or other development were to go ahead on the airfield. Quite frankly I am flabbergasted you are even considering the

airfield for such a shockingly large development in extreme close proximity to our small country village.

If you would like further information on any of these issues, please contact me.

Yours sincerely

Mrs Francesca Bramall

A BORGMAN EMAIL RESPONSE – 25 MARCH 2020

From: A [REDACTED]
Sent: 25 March 2020 12:41
To: forwardplanningconsultations
Subject: Future plans for Stafford and surrounding areas

Dear Future Planning Consultants,

Having looked through your plans for the future of Stafford and the surrounding area, I have many concerns, which I hope would be of some importance to you, but will not discuss here. However, I do have the following questions to ask and would like you to answer:-

1. As much of the land you have outlined as suitable, albeit after planning restrictions have been altered in the future, is presently being used for farming (agriculture or livestock), how is the food produced there going to be replaced?
2. As much of the land you have outlined as suitable, albeit after planning restrictions have been altered in the future, is presently greenfield land, what is going to happen to the myriad animals, birds, insects, flowers, trees, etc currently being sustained there (alongside humans as so much is farmed land)?

I look forward to hearing your reply.

Yours sincerely,
A Borgman

MR D J ALLEN EMAIL RESPONSE – 26 MARCH 2020

From: [REDACTED]
Sent: 26 March 2020 18:15
To: forwardplanningconsultations
Subject: Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document February 2020.

Dear Sir/Madam

I do not support any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood Plan.

The suggested garden village would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area for ever.

The SHELAA 2018 document Ref HIX07 incorrectly designates the garden village site as a “Recognised Industrial Estate in the Local Plan.” This is untrue and misleading; it is agricultural land and outside the industrial estate boundary - this calls into question the legitimacy of the proposal.

Yours sincerely

David J Allen

Stafford Borough
Council
26 MAR 2020
-Received



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	JOSEPH	N/A
Surname	JOHNSON	
E-mail address		
Job title (if applicable)	N/A	
Organisation (if applicable)	N/A	
Address		
Postcode		
Telephone Number		

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

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

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

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

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

Please note:

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

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

Part B: Your Comments			
Please complete a new Part B for each representation you wish to make.			
Name	J. JOHNSON		
Organisation			
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	Other
2. Please set out your comments below			
<p>Ribbon development will require by-passes for Houghton and Grosall to reduce the impact of lorries, buses and commuter traffic</p> <p>Development here will also impact on Stafford, encouraging long distance commuter traffic heading for the M6.</p> <p>The next development will be Junction 13A!!!</p>			

1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?			
Section	5	Paragraph	Table
Figure		Question	Other
2. Please set out your comments below			
<p>Given the dramatic effect (negative!) of the Coronavirus on all parts of the UK economy will this reduce the need for new housing? Will the government revise its figures?</p>			

Please use a continuation sheet if necessary

Stafford Borough
Council
26 MAR 2020
-Received

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

19 March 2020

Dear Sirs

Re: Stafford Borough Local Plan 2020 – 2040 - Issues and Options Consultation

I wish to respond to the Issues and Options Consultation Document dated February 2020, and in particular to paragraphs 5.36 to 5.63.

I have considered the six growth options under consideration and I note from paragraph 5.62, the Council is now minded to discarded growth options one, two and four.

Of the three remaining options I consider growth option three: Disbursed Development Across the New Settlement Hierarchy as the most reliable method of meeting housing demand over the plan period 2020 – 2040. My reasons are as follows:-

1. The major part of development would take place in the two most sustainable locations at Stafford and Stone (60% to 90%), where the existing infrastructure is in place to limit business and social movement. It would also support local facilities and may help to bolster trade to the respective high streets, which are currently under pressure.
2. The distribution of 15% to 40% amongst the large, medium and small settlements can be more easily absorbed without major detriment to the respective local environment or social harmony. That type of development can bolster much needed support for local amenities such as primary schools, local shops, bus services, pubs and other village amenities.

I hope you find these comments helpful.

Yours faithfully

Mr M W T Barlow

MR R CHARNAH EMAIL RESPONSE – 26 MARCH 2020

From: Richard Charnah [REDACTED]
Sent: 26 March 2020 18:24
To: forwardplanningconsultations
Subject: Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document
February 2020

Re: Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document
February 2020

Dear Sirs,

I do not support any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood plan.

The proposed garden village would dwarf both Hixon and Stowe-by-Chartley and would effectively destroy the character of the area, and in particular those villages, permanently and in a way that could not be reversed nor mitigated.

The SHELAA 2018 document Ref HIX07 incorrectly designates the garden village site as a "Recognised Industrial Estate in the Local Plan". As I understand it, this is untrue and misleading since it is agricultural land and outside the industrial estate boundary. This calls into question the legitimacy of the proposal.

Regards,

Richard CHARNAH

MS S MUNRO EMAIL RESPONSE – 26 MARCH 2020

From: Susanna Munro [REDACTED]
Sent: 26 March 2020 18:42
To: forwardplanningconsultations
Subject: Planning 2040

Dear Sirs,

Reference: **Stafford Borough Local Plan 2040**

When planning Stafford town centre please make better arrangements for parking nearer to the shops, this will help the shops, the town centre and the elderly.

I live 6 miles out of Stafford and am concerned that you have marked your 'Planning Map' to show Hixon Airfield as unused ground - rubbish, it is well used for agricultural purposes and has been ever since the airfield closed.

Recently it was flooded and any houses built there would be unfit for habitation due to rising damp, mould etc. Hixon has already increased in size very considerably so that it is impossible - even in normal times - to get a doctors appointment in less than three weeks. Amenities would have to be considered before any development is sanctioned in the village. Public transport is hardly worth worrying about as everybody uses their own transport which crowd the lanes round about. Employment areas for development are unlikely to employ people from new or existing houses as human nature being what it is people will always do the other thing. After the present crisis it may well be that in future many more people will work from home.

A Garden Community is not a bad idea but it must be **big enough** to have plenty of shops and leisure facilities which should be built before the accommodation buildings. These should be of many different designs - also allowing for some 'self-build' - all using environmentally friendly energy - wind, solar or earth heat pump. Also open spaces for football and other games. 11,500 houses at Cold Meece would perhaps be big enough for a Garden Community but Hixon Airfield is certainly not.

In your excessively long Plan document you promote Trentham Gardens which is not borough owned, it is privately owned and expensive to visit.

I look forward to hearing your next step. Susanna Munro

H JORDAN EMAIL RESPONSE – 27 MARCH 2020

From: Hilary Jordan [REDACTED]
Sent: 27 March 2020 09:53
To: forwardplanningconsultations
Subject: Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document February 2020

27 March 2020

Dear Sir/Madam

I do not support any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood Plan.

The suggested garden village would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area for ever.

The SHELAA 2018 document Ref HIX07 incorrectly designates the garden village site as a “Recognised Industrial Estate in the Local Plan.” This is untrue and misleading; it is agricultural land and outside the industrial estate boundary - this calls into question the legitimacy of the proposal.

Yours faithfully
Hilary Jordan

MR J JORDAN EMAIL RESPONSE – 27 MARCH 2020

From: John Jordan [REDACTED]
Sent: 27 March 2020 10:22
To: forwardplanningconsultations
Subject: Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document
February 2020

27 March 2020

Dear Sir/Madam

I do not support any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood Plan.

The suggested garden village would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area for ever.

The SHELAA 2018 document Ref HIX07 incorrectly designates the garden village site as a “Recognised Industrial Estate in the Local Plan.” This is untrue and misleading; it is agricultural land and outside the industrial estate boundary - this calls into question the legitimacy of the proposal.

Stowe Lane constantly suffers from speeding motorists, despite the 30 mph speed limit through the restricted areas and numerous HGV’s who use Stowe by Chartley as a shortcut to and from the A518 and who flagrantly ignore the weight limit. Any future developments on the Hixon Airfield would greatly increase these problems to unacceptable levels and make life unbearable for its residents.

Yours faithfully
John Jordan

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	JOSEPH	
Surname	CRAEN	
E-mail address	[REDACTED]	
Job title (if applicable)	RETIRED.	
Organisation (if applicable)		
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

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

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

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

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

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- 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		Organisation			
1. Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section	5	Paragraph	34	Table	
Figure	V1	Question		Other	
2. Please set out your comments below					
<p><i>It is stated that much of the airfield site is unused, however in recent years much of the airfield has been used for agricultural purposes</i></p>					

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

Joseph M Craen



Plan for 2000+ new houses in Hixon

Whilst there are numerous sites identified for potential house building in Hixon the main one causing concern is the airfield site.

1. The site is referred to as site ID HIX07 and is said to be designated as a "Recognised Industrial Estate". The site is
 - a. outside of the Hixon Settlement Boundary area
 - b. is not part of the existing industrial estate
 - c. has until very recently been used for agricultural purposes
2. The number of houses to be built on the site varies considerably depending on which figures are viewed. 1,923 on sheet ID HIX07 or up to 2,750 based on Stafford Borough Non-Technical Summary, a figure which is almost 45% more.
3. Where do the people that are likely to move to Hixon currently live and where do they work?
 - a. At the recent public exhibition the exhibitors were somewhat vague about this either not knowing or suggesting from a wide area.
 - b. Would it be possible to employ a further 2-3000 people in the new employment units which would occupy the 22.4 hectares marked for potential use?
4. There are limited opportunities for work within the immediate locality necessitating driving from the village.
5. At the recent public meeting the exhibitors suggested that new job opportunities would be brought to the area, although they were not specific about what type of work or where it would be based.
6. The boards brought to the recent exhibition included one showing a pyramid of "Sustainable Settlement Hierarchy" which did not include Hixon. Does this mean that Hixon Airfield development is not deemed to be sustainable?
7. The boards brought to the recent exhibition stated that Stafford Borough has a "rich historical environment", listing some of these. This list did not include Hixon Airfield, which was of great importance during the Second World War. Sadly there is no memorial on the airfield itself only in the village Memorial Hall some distance away. Sites like these are being lost across the country and may, in many areas, only be remembered in films and photographs.
8. The bulk of the new houses would be built in an area not directly attached to the village. They would be separated from it by the industrial estate and in particular the scrapyards running across a large section of the airfield. They would also be separated from Shirleywich and Weston by the West Coast Mainline Railway. This proposed estate would be part of Hixon in name only.
- 9.

- a. In July 2019 Stafford Borough Council declared a climate emergency and is therefore committed to employing measures wherever possible to reach carbon neutrality.
 - b. There is a government commitment to reduce CO2 emissions to zero by 2050.
 - c. 2000 extra cars driving to Stafford, and back, each working day, would add approximately 0.36 kilos of CO2 emissions per year per car. Based on just one car per household making the journey this would be in excess of 720 tonnes of CO2 per year.
 - i. These figures are based on 2018 figures obtained from Fleetnews. 125.1g per km and 14.4km return journey from Hixon Airfield to Stafford Station. Which Magazine tests show that CO2 emissions from new cars has risen by an average 11.2% since 2017 and in some cases up to 31.7%.
 - d. Exiting Hixon during busy times, with only a few hundred vehicles leaving, is currently very difficult. Even with possible added exit points from the village multiples of the few hundred could see the surrounding areas grind to a halt.
 - e. Recent flooding in the area, including the airfield, raises concerns as to the suitability of the site. Some of the local flooding issues may be seen in the photographs at the end of this letter.
10. The boards brought to the recent exhibition stated that the "Borough is well connected to the rest of the country and with HS2 this is set to improve." The HS2 website suggests that Stafford will be one of the stations served by HS2 however it is not on the main HS2 line but would be served by "rtrains". HS2 "rtrains" will travel on the existing West Coast Mainline according to the HS2 website. The nearest direct stations will be either Crewe or Birmingham. Completion of Phase 2 is said to be between 2035 and 2040, however these dates are said to be optimistic.
 11. There is currently no public transport from Hixon to any mainline railway station.
 12. The local primary schools do not have the capacity to take the number of pupils likely to come to the village.
 13. The local secondary schools also do not have the capacity to take the great increase in pupils who would eventually require places.
 14. NHS figures from 2018 show that the local surgery* in Great Haywood has 5 doctors for 8261 registered patients. The patient figure will have increased with the new homes that have been built in the surgery catchment area since 2018.
 - i. *Hazeldene House Surgery, Great Haywood state that it is possible to register with a doctor within 7 miles of your home. Based on the centre of Hixon, the doctors surgeries in Uttoxeter and Stone are both over 7 miles, but Stafford and Rugeley are within the distance. This would have an impact on surgeries across the area.
 15. Currently, unless there is an emergency, appointments can be up to 4 weeks even though the surgery states that they are not at full capacity.
 16. There is no public transport to Great Haywood from Hixon.
 17. Parking at the surgery is very limited as is on street parking.
 18. The nearest Police Station, open to the public, is 14 miles away in Cannock.
 19. The nearest Hospital with 24 hour A&E is 19 miles away in Stoke on Trent.
 20. The nearest mainline railway station is approximately 7 miles away in Rugeley, but only has 20 parking spaces. Stafford Station is 8 miles away but as with Rugeley is not serviced by public transport from Hixon. The first bus into Stafford arrives approximately 1 mile from the station at 8:17. The last bus of the day from Stafford is at 17:55.

These photos show only some of the recent flooding problems.



A51



Hixon Airfield



Hixon Airfield



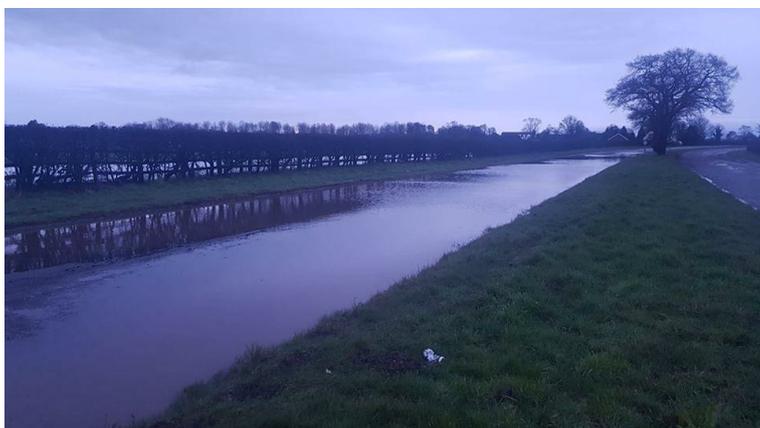
Hixon Airfield



Hixon Airfield



New Road Hixon



A51

MRS L ALLEN EMAIL RESPONSE – 28 MARCH 2020

From: [REDACTED]
Sent: 28 March 2020 13:00
To: forwardplanningconsultations
Subject: Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document February 2020.
Importance: High

Dear Sirs,

I do not support any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood Plan.

The suggested garden village would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area for ever.

The SHELAA 2018 document Ref HIX07 incorrectly designates the garden village site as a “Recognised Industrial Estate in the Local Plan.” This is untrue and misleading; it is agricultural land and outside the industrial estate boundary - this calls into question the legitimacy of the proposal.

This call for land is reducing the capability of food production which is vital to feed people not only locally but also nationally. We can provide photographic evidence that this land has been used over many years including last year for crop growing and grazing livestock and this will therefore provide evidence that the land is agricultural.

Also please consider that this current pandemic is extreme in highly populated areas as the disease can spread more easily and quickly. Surely this is no the time to review how many properties are being built within the county as we no longer have a fully working A&E unit or enough GP's to cope with the current population.

Mrs. L. Allen

[REDACTED]

[REDACTED]

C H BENDALL EMAIL RESPONSE – 30 MARCH 2020

From: c.h.bendall [REDACTED]
Sent: 30 March 2020 12:28
To: forwardplanningconsultations
Subject: Ref - Stafford Borough Local Plan 2020-2040: Issues and Options Consultation Document February 2020

Dear Sirs/To Whom it may concern,

Re: Ref - Stafford Borough Local Plan 2020-2040**Issues and Options Consultation Document February 2020**

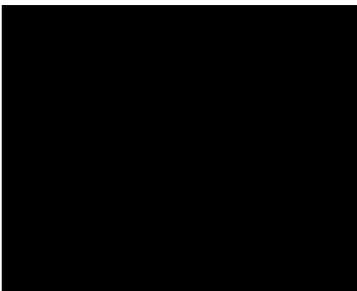
I object to/do not support each and any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood Plan.

The suggested "garden village" would overwhelm and completely dwarf both the adjacent villages of Hixon and Stowe-by-Chartley and would adversely affect the character of the area forever.

The SHELAA 2018 document Ref HIX07 incorrectly designates the proposed "garden village" site as a "Recognised Industrial Estate in the Local Plan." This is incorrect and misleading; it is and has been agricultural land and outside the industrial estate boundary - this calls into question the basis and legitimacy of the proposal.

Yours faithfully,

C.H Bendall



M LANNIGAN EMAIL RESPONSE – 30 MARCH 2020

From: Margaret Lannigan [REDACTED]
Sent: 30 March 2020 10:54
To: forwardplanningconsultations
Subject: Ref - Stafford Borough Local Plan 2020-2040

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

To Whom it may concern,

I do not support any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood plan.

The suggested garden village would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area forever.

The SHELAA 2018 document Ref HIX07 incorrectly designates the garden village site as a "Recognised Industrial Estate in the Local Plan." This is untrue and misleading; it is agricultural land and outside the industrial estate boundary - this calls into question the legitimacy of the proposal.

Yours faithfully,

Margaret Lannigan
[REDACTED]
[REDACTED]

MR J LAMERIS EMAIL RESPONSE – 30 MARCH 2020

From: JOHN LAMERIS [REDACTED]
 Sent: 30 March 2020 15:07
 To: forwardplanningconsultations
 Subject: Consultation - Stafford Borough Local Plan 2020- 2040

Consultation re STAFFORD
 BOROUGH LOCALPLAN-2020 -2040

I have the following major concerns:

Re Section 5.34: Potential
 Garden Communities in Stafford Borough

[A] Misleading description of the former Hixon Airfield

As a retired chartered town planner, I was most surprised that on the consultation, including the Non-Technical Summary, and support materials are heavily biased towards the option for major development on the former Hixon Airfield.

Witness:

At 5.34 *“Much of the site is currently unused and is partly developed as an industrial park.”*

This is simply not true; as the area is largely in agricultural use, save for the remains of the runways that only form a small proportion of the area, as it has been since the airfield was decommissioned. This description is in stark contrast to that given to the similar Seighford site *...a largely agricultural site with an airfield and established employment land...*

The false description of the Hixon option is unfortunately compounded by your associated strategic Housing and Employment Land Availability Assessment, 2019 Update, which at has the site in Hix07 designated *as a Recognised Industrial Estate in the Local Plan*. As you will be aware, the designated industrial area is wholly to the south.

My concern is that the great majority of those in SB looking at your comprehensive consultation document will be unaware the above, and assume the land is an ‘obvious’ candidate for major development. I regret to say that such inadvertent errors at the very least tarnish your otherwise comprehensive public consultation, and could lead it open to challenge.

[B] In addition with regard to the suitability of the former Hixon Airfield site, Stowe Lane/Bridge Lane represent major cost constraints as

significant road improvements would be required, having both cost and aesthetic implications to the rural character of the area.

Stowe Lane

between Hixon and Stowe has no footpath and is barely wide enough for two cars in several places and already challenging for pedestrians, pushchairs/wheelchairs and horse riders, let alone drivers who almost invariably have to pull to one side to allow larger vehicles by. It is heavily incised in sections with nowhere for pedestrians and others to get out of the way of vehicles. Bridge Lane is similar particularly in the last 100metres or so towards the A518, where it is only one vehicle width.

Questions 5G and 5H

There should be no development outside the current and recently approved boundaries for Hixon as set out in the Hixon Neighbourhood Plan.

I believe that sustainable and vibrant development is best achieved by strategies that concentrate development in larger settlements. For example, it is clear that the larger the settlement, the more comprehensive, attractive and economic a public transport service can be provided. Whilst some development in smaller centres is appropriate, it is important to maintain the character of small villages and hamlets. I can only commend the report of the successors to my former colleagues in North Warwickshire Borough Council:

*North Warwickshire BC's
Sustainable Settlement Assessment (updated 2018)*

“6 Conclusions

6.1 The level of new development that is to be accommodated in the Borough is higher than ever before and the Local Plan's approach is still to steer most development to the Main / Market Towns and Local Service Centres within North Warwickshire, where a wide range of services and facilities already exist and these facilities could be built upon to create more robust sustainable settlements.

A limited amount of development is targeted to the smaller settlements which follow the recommendations of the Matthew Taylor Report which advocated more development in the rural areas, to assist in maintaining the vitality of the rural settlements. However development takes a cascade approach in the other settlements with very little development towards the wide countryside.”

I therefore favour option 1, and find option 2 acceptable so far as it follows the existing planning framework and reject options 3, 4 and 5

Yours faithfully

John Lameris LLB, BA, BA, Dip
T&CP, MRTPI(Ret),MCILT (Ret)

MR P LUQMAN EMAIL RESPONSE – 30 MARCH 2020

From: Paul Luqman [REDACTED]
Sent: 30 March 2020 10:50
To: forwardplanningconsultations
Subject: Ref - Stafford Borough Local Plan 2020-2040

Ref - Stafford Borough Local Plan 2020-2040
Issues and Options Consultation Document February 2020

To Whom it may concern,

I do not support any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood plan.

The suggested garden village would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area forever.

The SHELAA 2018 document Ref HIX07 incorrectly designates the garden village site as a "Recognised Industrial Estate in the Local Plan." This is untrue and misleading; it is agricultural land and outside the industrial estate boundary - this calls into question the legitimacy of the proposal.

Yours faithfully,

Paul Luqman
[REDACTED]
[REDACTED]

Name: Mrs Jean Moreland

Address:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Email:

[REDACTED]

Re: Stafford Borough Council Local Development Plan 2020 -2040

Having attended the public meeting in Hixon Memorial Hall on 29th February, I wish to register my support for the objections raised by Hixon Parish Council against the Local Plan Review proposals relating to Hixon.

Also, by summing all the areas involved, I calculate the total would be 157.7 hectares, of which 33.3 would be greenfield. This is 21.12% of all the proposed development. I feel this is a high proportion of the whole, which would inevitably destroy much wildlife habitat. Furthermore, if roughly half the 'mixed' green and brown field sites are in fact green (as maps of plans appear to show), this would be a further 9.25 hectares lost, increasing the overall green loss to 26.98% of the total development area.

I also feel that the current village of Hixon would become surrounded and would suffer a considerable negative impact not only from increased traffic but also increased demand on services such as water supply, sewage disposal, GP surgeries (already stretched) and schools.

Yours sincerely

Jean Moreland.

N COOKE EMAIL RESPONSE – 30 MARCH 2020

From: Nina Cooke [REDACTED]
 Sent: 30 March 2020 10:59
 To: forwardplanningconsultations
 Subject: Hixon and the proposed new local plan

re proposal of new development at Hixon

I am amazed at the new plan. Why did we bother with the last one.

I thought the power station was going to be a 2300 housing development. Do we really need another "garden village" of equal size less than 8 miles down the road?

So the proposal is that I can't get to Rugeley/Stafford because of HS2 construction and I can't get to Uttoxeter/Stone/Stoke because of a new housing village being built. Neither of which will give me any benefit.

My house is at the top of the hill in Hixon, currently looking out over beautiful country side. The airstrip is already becoming an eyesore with all the buses, but fortunately I can currently overlook this and see the pleasant pastures past this. This development means I will look at miles of houses.

Living on a hill has been challenging but worth it for the views. I am not looking forward to the view of urban sprawl. Noise also travels to the top of the hill from miles around and although the Weston junction is a lot safer the bright lights can also be seen for great distances. What noise and light pollution 2300 more houses will create is unimaginable.

We have a poor NHS and Police service in the area. This is a point on which I would strongly argue, justified by stating my many personal and tragic incidents. Our roads are in dire repair and it takes forever to get anywhere. To get a decently paid job you have to travel and if I was offered one the other side of Stafford I would decline due to the impassibility of the road systems. Stone is no better. The Stafford sports centre is tiny compared to the previous Riverside complex. The only decent thing was our waste disposal and even with the hundred of new houses paying council tax to the borough these services have been cut this year and we are being charged more.

Hixon has no dentists, no doctors and no pharmacy, no big supermarket nearby, few footpaths, few post-boxes and no bus service to our designated doctors. We have put up with this as we are a village...and the proposal is to add at least another 5000 people to this area.

Finally, however, I wish to ask if there has been consideration to water. We could not build a railway tunnel at Hixon as the water levels are too high, so it had to be a railway bridge. The Hixon airfield and surrounding fields are effectively a flood defence. Building on flooded areas is really not a good idea and often creates more issues elsewhere.

I know that my opinion will count for nothing and I will spend my last years surrounded by a building site. I really have no faith in Stafford town planners.

Why don't you bulldoze Stafford town centre and build a "garden village" there, as by my reckoning it isn't currently being used for anything else !

Regards
Nina Cooke

E & S-A McOWAN EMAIL RESPONSE – 31 MARCH 2020

-----Original Message-----

From: Sally-ann mcOwan [REDACTED]

Sent: 31 March 2020 16:05

To: List-ForwardPlanning-SBC

Subject: Stafford Borough Council Local Plan 2020-2040 Issues and Options Consultation Document February 2020

Dear Sirs

We do not support proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries, as defined in the adopted Hixon Neighbourhood Plan.

The suggested garden village would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area forever.

The SHELLA 2018 document Ref HIX07 incorrectly designates the garden village site as a 'Recognised Industrial Estate in the Local Plan'. This is untrue and misleading; it is agricultural land and outside the industrial estate boundary. This calls into question the legitimacy of the proposal, to which we object in the strongest possible terms.

Elisabeth McOwan

Sally-Ann McOwan

E & S-A McOWAN EMAIL RESPONSE – 31 MARCH 2020

-----Original Message-----

From: Sally-ann mcOwan [REDACTED]

Sent: 31 March 2020 16:05

To: List-ForwardPlanning-SBC

Subject: Stafford Borough Council Local Plan 2020-2040 Issues and Options Consultation Document February 2020

Dear Sirs

We do not support proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries, as defined in the adopted Hixon Neighbourhood Plan.

The suggested garden village would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area forever.

The SHELLA 2018 document Ref HIX07 incorrectly designates the garden village site as a 'Recognised Industrial Estate in the Local Plan'. This is untrue and misleading; it is agricultural land and outside the industrial estate boundary. This calls into question the legitimacy of the proposal, to which we object in the strongest possible terms.

Elisabeth McOwan

Sally-Ann McOwan

J & C CLEMENTS EMAIL RESPONSE – 31 MARCH 2020

From: Celia Clements [REDACTED]
Sent: 31 March 2020 16:43
To: forwardplanningconsultations
Subject: Proposed development site on Hixon Airfield

Dear Sirs

I am writing to record my objections to the Hixon Airfield development plans.

This is farming land and definitely not unused land. There are public footpaths all around the proposed site which are constantly walked. We also have skylarks (which are ground nesting birds) in abundance on the site and we also have Buzzards nesting. There are hares and other wildlife across the site.

My other objections include the following:

The development would greatly increase the number of cars on what are very narrow lanes and would indeed increase carbon emissions at a time when we need to reduce them. We should be thinking about climate change. There would be a need to increase public transport but I find that people tend to use their own transport to get from A to B. Access points to this housing development are potentially planning to be off country lanes that do not have footpaths and are only 1 car width in places.

Visually, this site already has industrial sites surrounding it with planning to increase it. I personally would not like to live in an area surrounded by industry as you would be less likely to find employment within the immediate area. This would mean that they would have to travel to find employment.

I do not support more employment land in Hixon. There is already a need to improve the road network system to accommodate the cars travelling to these employment sites. With new sites this would be increased hugely and make the situation more difficult and frustrating at peak times.

I believe the Hixon Airfield is incorrectly defined in the Local Plan Review document as being within the Recognised Industrial Estate Boundary.

And lastly, as the country has more pressing matters to deal with at present I do hope that this reaches you in time and is considered along with others you will have received. I was advised that the e-consultation form is problematic to complete in the given time it gives you which is why I chose this way to object.

Yours faithfully

John and Celia Clements

MR S PHILLIPS EMAIL RESPONSE – 31 MARCH 2020

From: Shane Phillips [REDACTED]
Sent: 31 March 2020 08:54
To: forwardplanningconsultations
Subject: Local Plan Review Consultations

Dear Stafford BC

I have reviewed the local plan review proposals on your website and can understand why new housing needs to be built in the area. The idea of a new garden village does sound a sensible way forward, as long as the garden village would be big enough to exist as its own entity with its own shops, schools, medical and health facility, new road and transport links etc. If large scale housing were instead forced into existing smallish village areas then it would create a real burden to the infrastructure of those villages. In particular the land at Hixon Airfield to the east of Weston would seem to be quite unsuitable. It would not be a big enough development to warrant new schools, new shops, new medical facilities etc. Also it would place an extreme burden on the existing small local villages such as Stowe By Chartley where the narrow lanes would be expected to cater for the tremendous increase in road traffic. This would very much be a road safety risk to both drivers and pedestrians. My understanding is that this site is actually a green field site and so this would also make it less suitable. In recent years Hixon has already seen a 24% growth in the number of houses. Adding such a large adjacent development would I feel completely alter the character and way of life to this village and to Stowe By Chartley very much for the worse.

I did download the forward planning consultations document and attempted on several occasions to complete the e-consultation form but found the process far too onerous for a member of the public to work through, even at three or four sittings. Can you please make it easier for members of the public to respond to any future proposals.

Yours faithfully

Mr Shane Phillips

MRS J LAMERIS EMAIL RESPONSE – 31 MARCH 2020

From: JOHN LAMERIS [REDACTED]
Sent: 31 March 2020 17:44
To: forwardplanningconsultations
Subject: Stafford Borough Local Plan - Issues and Options Consultation Document

Consultation: STAFFORD BOROUGH LOCAL PLAN-2020 -2040.

Issues and Options consultation document

Response from Mrs Julia Lameris

Re 5.34: The consultation document incorrectly paints the former Hixon airfield as effectively brownfield, rather than largely being in agricultural use. This in marked contrast to the description of the former Seighford airfield, and biases the consultation.

Questions 5G/5H

Residential development on the former airfield would effectively be an extension to Stowe, rather than to Hixon's residential areas located as they are on the other side of commercial development. Historic small-scale communities, such as Stowe, are special places. Future society would question the need for its absorption into an inefficient random straggle of residential and commercial development from Weston to Stowe, as in the suggestion of combining the Weston and Hixon options.

I suggest the NPPF reflects a temporary fashion in government / planning policy, as was the admittedly more extreme example of "streets in the sky" fad of the late sixties and seventies that created blighted communities of mid-rise decks, such as Moss Side. Major residential development should be close to major facilities and employment, as well as varied opportunities for sustainable travel.

I therefore advocate that Option One be adopted.

I consequently support the representations made by Hixon and Stowe Parish Councils on the above Local Plan Consultation. That is to say, I do not agree with any residential or employment proposals outside the Hixon residential settlement boundary and established industrial estate boundaries as set out in the adopted Hixon Neighbourhood Plan.

Yours faithfully

Mrs Julia Lameris BA, MBA

MS J E BANKS EMAIL RESPONSE – 4 APRIL 2020

From: Joanne Banks [REDACTED]
Sent: 04 April 2020 14:45
To: List-ForwardPlanning-SBC
Subject: New Stafford Borough Local Plan 2020-2040

Good afternoon,

I have been for some time wading through the online documents regarding the consultation for the 'New Borough Local Plan 2020-2040'. I appreciate you have tried to address all possible queries and scenarios, trying to find the crucial information is difficult.

The outlines for the suggested 'Garden Communities' suggest that some of the settlements will be sizeable. A major concern is the reduction of 'open space' for people to enjoy. Even more so during the current covid-19 crisis, people are valuing open spaces more and more. I am aware the population continues to grow, nationally and within the Borough and, therefore, provision needs to be made for houses. Nonetheless, open space land should be valued as an asset and not just thought of as potential building land.

Stafford Town has many, many empty buildings and I believe these should be adapted first for homes before moving onto other areas. This would make use of existing transport infrastructure. Plans for the redevelopment for this area have not been made clear and many of the buildings have been empty for quite some time. In 'Panel 2-Scoping Issues Consulting-Economic Development' I concur with the importance of returning focus for developing retails to Stafford Town Centre; encouraging independent businesses especially.

With reference to the areas where the Garden Communities are proposed, there would need to be considerable modification to the local infrastructure; transport; schools; doctors etc. Although this has been mentioned generally in the consultation document more specific information is required to offer an informed opinion.

What would the proposed building plan mean for Stafford Hospital. Surely, such an amount of building would necessitate County Hospital Stafford becoming once more a FULLY functioning hospital with a 24/7 A & E Department, in order to efficiently and comprehensively serve the people of Stafford Borough?

With reference to the type of housing to be built. There is a need for family homes and homes for individuals, however, it is clear from the consultation document that the population of people 65+ will substantially increase between 2020-2040 and more specific details of housing to be provided for this demographic in each of the proposed 'Garden Communities' should be available.

I look forward to your response and understand due to the current crisis there may be a delay.

Kind regards

Joanne E Banks

MR & MRS HORTON EMAIL RESPONSE – 7 APRIL 2020

From: Em [REDACTED]
Sent: 07 April 2020 13:56
To: forwardplanningconsultations
Subject: Fwd: letter

Sent from my iPad

Subject: letter forwardplanningconsultations

Dear Stafford Borough Council.

We are writing to you to let you know that we are opposed to the suggestions of a housing estate of £2.345 being built in our beautiful English village, Stowe-by-Chartley. Hixon and Weston plus more in the surrounding villages. Creating one massive urbanization

Having lived here for over 45 years and having enjoyed the green fields around, we would like this special place to be preserved for the next generation to enjoy. The village boasts an ancient church which enjoys a regular and well-attended service, a traditional English pub and a quaint village hall which has had a recent refurbishment and is only large enough to cater for the current population.

In 2018 and 2019, the village was highly commended as one of the best kept villages in Staffordshire. It is very difficult to see why an attempt would now be made by the Council to destroy one of the last preserved villages in our countryside.

Stowe-by-Chartley is also a historic village where you'll find the alabaster tomb of Sir Walter Deverux and his two wives. Sir Walter's grandson Robert, the 2nd Earl of Essex, was a favourite of Queen Elizabeth I. It was after visiting her friend Robert, that Elizabeth I decided Chartley Hall would be a suitable place for her cousin Mary Queen of Scots. It was here that the plot by her Catholic supporters to free her went terribly wrong.

During the WW2, the airfield was used as a [Royal Air Force](#) station launching famous planes such as the Hurricane, the Wellington, the Bristol Blenheim amongst others. After opening in 1942, it served as a base for No. 30 Operational Training Unit and, after the OTU left up until its closure in 1957, it served as a satellite site for No. 16 Maintenance Unit based at [RAF Stafford](#). The Control Tower is still extant and has been converted for office and private use.

The Airfield reverted back to Agriculture Land after the of the Second World War.

So, you can see that Stowe-by-Chartley has a lot of history and should be preserved in its current form.

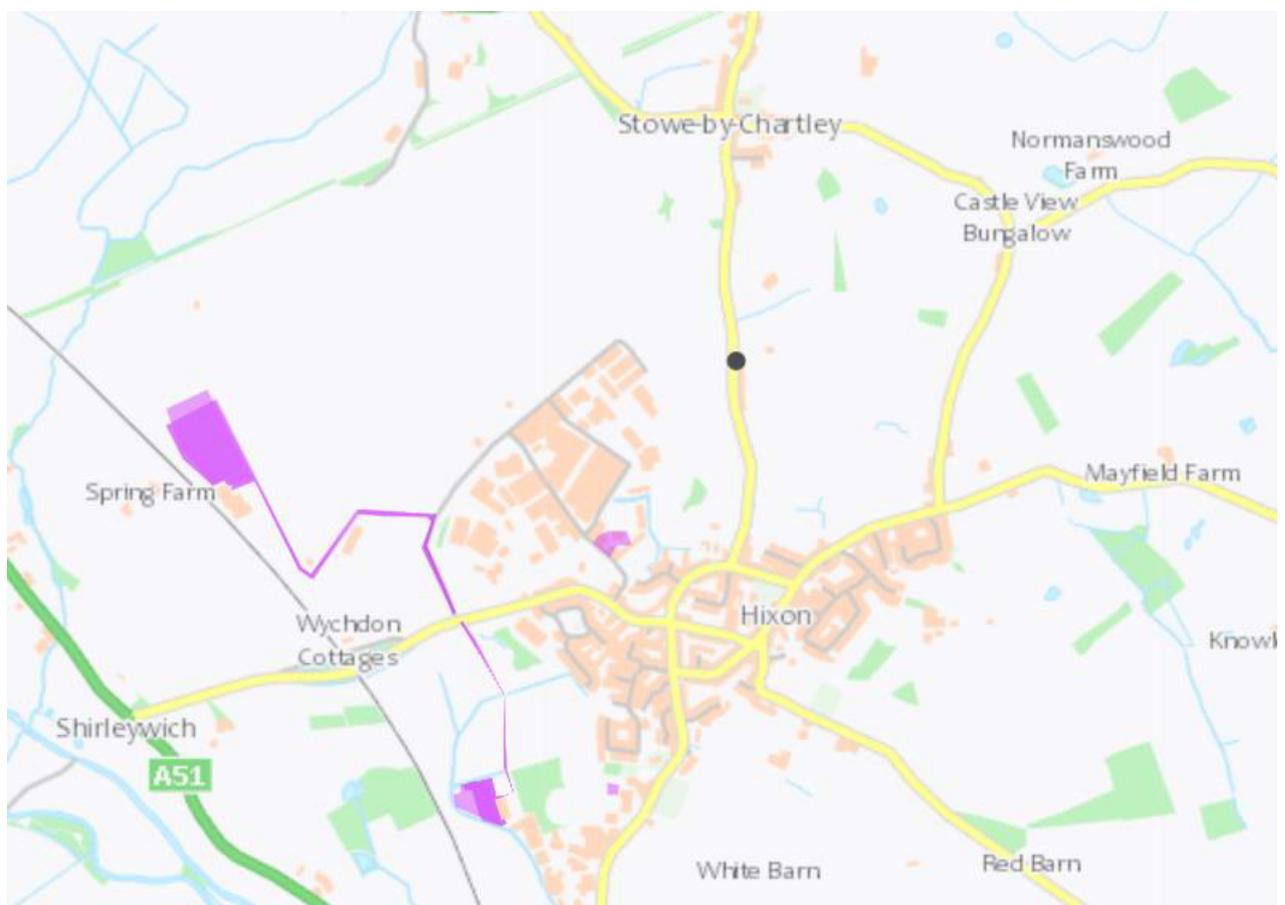
The village consists of a few houses which are served by 2 country lanes barely wide enough for two cars to pass. The increase of traffic caused by the proposed housing development (or even 10% of what is proposed) is unthinkable. The pollution caused by such an endeavour would have a detrimental effect on the living quality of the current residents.

A recent study by [Staffordshire University](#) stated that green space in Staffordshire is saving £21 million a year in healthcare costs. The research revealed by the Office for National Statistics shows

that Staffordshire has the 2nd highest level of green space benefits after Berkshire. This measures the amount of pollution removed by vegetation such as trees and hedgerows.

The Staffordshire Council website states that 'a varied landscape and biodiversity is vital to our wellbeing and key to the quality of life in Staffordshire.' We can help but think that this is no longer the case and our beautiful landscape and biodiversity in a rural countryside setting is being endangered should this proposal of house development go ahead.

Over the years we have been watching in disbelief the amount of housing development in our neighbouring village Hixon. Hixon is now beyond recognition and is no longer the quaint little village it once was. We don't want the same to happen to one of the last surviving villages in Staffordshire. Please see below the difference in size between Hixon and Stowe-by-Chartley.



As mentioned above we have lived here for over 45 years and have enjoyed the views over the green fields from our lounge. This new housing development would not only destroy our views and therefore have detrimental reduction in our living quality, it would also significantly reduce the market value of our house which we worked hard for and we were looking forward to enjoying in retirement.

We believe that Staffordshire Borough Council should represent the interests of the people living in their borough. If this is a government initiative, maybe it is time that Stafford BC states that there is no further housing need in the local area.

Yours faithfully,

Mr and Mrs B R Horton

Personal Response to Consultation on: -
Stafford Borough Local Plan 2020-2040
Issues and Options Consultation Document

February 2020

I would suggest that the most fundamental issue to be resolved at this stage is the appropriate level of additional housing provision to be made in the period 2031 to 2040 (9 years).

During the first 8 years of the plan period (2011 to 2019) the Council reported in Land for New Homes - The Housing Monitor 2019¹ that 4830 new homes were completed; an average of 636 new homes per year - which is 136 dwellings (more than 20%) over target.

Using the Council's March 2019 figures there were 4591 commitments with planning permission and 2224 allocations which await planning permission; a total of 6815 for the remainder of the plan period to 2021 (12 years). This gives an average of 568 dwellings per year against a target of 500 dpa. In practice this number is likely to be greater as it is certain that further 'windfall' permissions² will be granted and completed in the 12 year period.

If the Council adopted Central Government's requirements for the provision of 408 new dwellings per annum this would give a requirement over 21 years (2109 – 2030) of 8568 new dwellings - of which 6815 are already committed. This would leave a balance of 1753 to be found by new housing allocations for the 9 years from 2031 to 2040.

It is accepted that 'windfall' sites are likely to lead to significantly more new homes than are required. 'Windfalls' from 2019 to 2040 have not been estimated by the Council but are likely to be very significant (Land for New Homes 2019 showed that in the 8 years from the current plan's adoption most new homes were built on 'windfall sites (56% of completions were on windfall sites with 44% on allocated sites³.)

¹ Land for New Homes THE HOUSING MONITOR 2019
<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Monitoring/Housing%20Monitor%20Land%20for%20New%20Homes%202019%20FINAL.pdf>

² Windfall Site - Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.

https://www.planningportal.co.uk/directory_record/594/windfall_site

³ Land for New Homes 2019- Figure 3

By adopting this approach the Council could: -

- Comfortably, and demonstrably, exceed Government new housing requirements.
- Limit the need for additional housing allocations on new Greenfield sites and
- Avoid new settlements on any of the Greenfield sites identified in the Consultation.
- Encourage more sustainable development.
- Consistently exceed National Government's National Planning Policy Framework (NPPF) requirements for more than 5 year supply of new housing with planning permission.
- Allow and empower local communities and their Parish Councils to bring forward appropriate sites for Affordable and Market Housing through Neighbourhood Plans and Neighbourhood Development Orders - rather than being imposed by the Borough Council
- Provide for the assessment of Meecebrook, focussed around Cold Meece between Swynnerton, Eccleshall and Yarnfield, to proceed without it becoming a requirement included in the current Local Plan Review (it would be more appropriately considered in the required review for the Local Plan 2025 – 2045).
- Accept that new employment provision is more appropriately based on housing numbers rather than as used in the Issues and Options Consultation Document.
- Reduce the need for additional employment development on greenfield sites.
- Better meet the Local Plan Vision and Objectives, both for the existing Local Plan 2011-2031 and the Plan Review 2020 – 2040.
- Better encourage the development of affordable housing in appropriate locations.
- Prove likely to be more acceptable to local people and their elected Councillors.
- Be within the powers of the Council without conflict with National Government.

Paul F. Windmill

[REDACTED]

[REDACTED]

Housing Numbers

Land for New Homes

Table 2 - Completion Rates Plan Period

Number of Cumulative Completions (2011 - 2019) 4,830

Remaining Balance (2019 - 2031) 5,170

(Balance from the 10,000 in the Local Plan 10,000 – 4830)

Stafford and Stone Allocated Locations

Land for New Homes 2019 Table 4 –

Number of outstanding net commitments as at 31st March 2019
4,591

Land for New Homes 2019 Table 5 -

Summary of Allocated sites in Stafford and Stone at 31 March 2019

- Remaining Allocation (without Planning permission) 2,224

Summary

Number of Cumulative Completions (2011 - 2019) 4,830

Number of outstanding net commitments as at 31st March 2019
4,591

Remaining Allocation (without Planning permission) 2,224

TOTAL 11,645

Paul F. Windmill

[Redacted signature block]

[Redacted line]

Thursday, 14 May 2020.

MS A TILSLEY EMAIL RESPONSE – 9 APRIL 2020

From: Tilsley, Alison [REDACTED]
Sent: 09 April 2020 13:03
To: forwardplanningconsultations
Subject: Letter reference Local Plan: Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document February 2020.

Good Afternoon

I do not support any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood Plan.

The suggested garden village would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area for ever.

The SHELAA 2018 document Ref HIX07 incorrectly designates the garden village site as a “Recognised Industrial Estate in the Local Plan.” This is untrue and misleading; it is agricultural land and outside the industrial estate boundary - this calls into question the legitimacy of the proposal.

Yours sincerely

Alison Tilsley

From: [REDACTED]
[REDACTED]
14 April 2020

Via e-mail: forwardplanning@staffordbc.gov.uk
Stafford Borough Council
Forward Planning
Civic Centre, Riverside
Stafford
ST16 3AQ

Dear Sirs

Stafford Borough Council - Draft Local Plan 2020-40

Please see below comments on Stafford Borough Council's proposed draft Local Plan for 2020-40.

1. Following Gnosall Parish Council's advice to the Borough Council, the percentage development figure shown for Gnosall in respect of houses built under Section 5 of this Plan, previously under-representative and consequently incorrect, has now been amended. Stafford Borough Council should be aware that Gnosall has virtually doubled in size over recent years due to additional residential development and is now, with some 5,000 plus residents, officially classed as one of the largest villages in England.
2. Gnosall and other villages in the Borough Council's area have adopted Neighbourhood Plans in recent years in an attempt to prevent future inappropriate large-scale housing development. These Plans could now be threatened by changes to the Settlement Boundaries on which these Plans are based. The Borough Council should be mindful of the implications of this issue.
3. The proposed garden village developments, Sites 1 and 2 shown in the proposed Local Plan, cover areas around Gnosall and Haughton including the Audmore Loop in Gnosall. The Audmore Loop is situated outside the Gnosall Settlement Boundary and has previously been the subject of housing planning applications which, following considerable local opposition, have on every occasion been rejected by the Borough Council.
4. Site 2 appears to virtually merge together Gnosall and Haughton by allowing residential development on what is currently County farm land. Has any thought been given, or research undertaken, on whether the residents of Gnosall and Haughton would actually want this to happen? DCLG guidance in 2016 stated that a garden village should be "a new discrete settlement and not an extension of an existing town or village" with a "clear and distinct sense of identity". These two villages already have communities with a completely separate, strong and distinct sense of identity, as evidenced by their own parish councils. The DCLG guidance also stated that 'garden village' should not be used as a convenient label to cover potentially inappropriate development. Proposals like this always appear to show a complete lack of consideration for the current residents in the areas likely to be affected by, and indeed disadvantaged by, additional large scale residential development immediately around them. The Borough Council's forward planners should realise that people living in these rural areas mostly do so because they have chosen to live in rural, and not urban, areas, and consequently are likely to be very unhappy with, if not downright angry at, these proposals.
5. I find it astonishing that potentially productive County farm land in both the Gnosall and Haughton Sites 1 and 2 locations could now apparently be made available for housing development. In view of Brexit and particularly the current C-virus situation, it is now generally acknowledged that this country will urgently need to become more self-sufficient in terms of its food production and supply. I fail to see how the loss of any current potentially productive farm land in the County to future large-scale housing development can now easily be justified, particularly since further productive farm land is now likely to be lost east of Stafford along the HS2 route through the county. The County Council has recently had good publicity in respect of supporting its County farms. Does it now want the bad publicity that would be generated by it doing the exact opposite? This is an area
/contd

where some creative thinking from the “creative county” could pay dividends. This in respect of the Gnosall/Haughton proposal should not involve covering acres of potentially productive farm land along several miles/kilometres of a convenient ‘A’ road between two villages with separate and distinctive local identities with urban sprawl.

6. The proposed garden village sites 1 and 2 may generate some employment opportunities, but these would mostly be short-term construction jobs in areas where there is no existing infrastructure to support them. Other jobs generated would in all likelihood not be in the immediate areas. It's very obvious that, given their proposed locations, these garden villages would immediately be populated by car commuters, particularly now that the HS2 link directly into Stafford town centre does look likely to go ahead. The implications for all of the Borough's roads and the M6 of substantial additional housing development averaging two cars per household in this and other rural areas should be clear. The potential development site 2 along the A518 covers several miles/kilometres between Gnosall and Haughton. The implications for this ‘A’ road, which in addition to current traffic also takes a substantial amount of holiday traffic during the summer months, should also be clear. It should also be noted that much of the farm land along the A518 between the two villages is prone to flooding.
7. NHS provision for Gnosall and Haughton is already at full capacity. School provision for both villages is currently at or approaching full capacity. There is no guarantee that additional NHS/school provision would, or could, be made available for proposed sites 1 and 2.
8. In view of what is now known about environmental issues and particularly emission levels, large scale residential development in the Stafford Borough area in the future should be concentrated on brownfield sites in or immediately around the existing town. This would be far more sustainable in respect of transport links and also help to increase much-needed footfall in the town centre's shopping areas. This would also help to preserve the lovely rural nature of the west of the Borough/County, which is in itself an amenity and visitor attraction and also a gateway to other visitor destinations in East Shropshire situated close to the county border.
9. In view of the above, once all brownfield sites in Stafford have been exhausted, site 4 shown in the draft Local Plan, land immediately north of Stafford with the Redhill industrial estate providing existing and future employment opportunities, could potentially be an option for proposed future housing development in the Borough. This could also allow for a less intrusive, smaller scale development of the Cold Meece brownfield site, which may well be more acceptable to local residents in that area.
10. Development immediately north of Stafford town could also facilitate the provision of a Stafford Parkway rail station which, in view of Stafford's increasing population and traffic congestion around the current rail station, will now in all likelihood be needed in the near future.

Yours faithfully

A Clark

MR N HOLMES EMAIL RESPONSE – 14 APRIL 2020

From: Alison & Nigel Holmes [REDACTED]
Sent: 14 April 2020 23:16
To: forwardplanningconsultations
Subject: New Local Plan 2020-2040 - Questions & Comments

Thank-you for giving me the opportunity to comment on the New Local Plan 2020-2040.

It appears that Stafford Borough are obliged to give up yet more green space to meet government targets to satisfy the ever increasing demand for housing over the next 20 years... Personally, I would much prefer that existing brownfield sites were redeveloped, instead of destroying yet more countryside! Admittedly most of the brownfield sites are in the Stoke-on-Trent area rather than Stafford and Stone, but surely it would make more sense to consider Staffordshire as a whole, when trying to meet this need?

In the Stone area we have seen a huge amount of building in recent years, without a corresponding increase in the supporting infrastructure... Clearly this can't continue and will, in due course, spoil the pleasant 'semi-rural' nature of this area.

I have no real objection to re-developing the local army camp at Swynnerton as a 'garden city', as this is already a brownfield site, but when I looked at the plan, I noticed that a much larger area had been earmarked... This causes me great concern, as I believe that a development on this scale would not only result in the loss of valuable agricultural land, it would also have a negative impact on the surrounding villages.

I sincerely hope you will give serious consideration to my comments and therefore try to preserve the features that make Stafford Borough a desirable area to live... by preventing overdevelopment.

Regards

Nigel Holmes

Beryl Metcalf [REDACTED]

In common with earlier similar plans from Stafford, the plan is full of worthy sentiments but there tends to be a lack of practical enforcement.

- 3.1 Prioritizing population and economic growth in the long run is not compatible with a sustainable future. The earth has more people than it can sustain in food and biological capital and hence all economic growth ought to be predicated on greater materials and energy efficiency.

Therefore in principle provision should be made only for natural growth plus any migration arising from climate change and war pressures.

At time of writing we may also be faced with a sudden raft of empty property arising from the covid 19 pandemic. Because of the embodied energy, we should clean, reuse and upgrade these properties rather than using up more land and materials. New build nearly always entails use of much new concrete if only for access roads which uses loads of energy to make the cement.

The vision is OK as it stands but needs a 4th point to spell out

- the need to conserve and enhance the biological and botanical capital of the Borough.

- 3.2 Agree

March 29th – a fortnight into Covid lockdown:

- 3.3 – 3.5 The aspirations are great but not matched by reality.

- 3.3b` The housing beyond Beaconside has no recreation open space or sports provision.

- 3.3c I don't notice sufficient affordable housing. I don't know about gypsy and traveller sites but we had problems with gypsy emcampments in Holmcroft. The local authority built humps round our open spaces (including where we would park for large funerals etc at St Bertelins) but I'm pretty sure this happened because of lack of satisfactory caravan sites. In the past the local authority has not supported private sites set up by travellers but that would be preferable to hijacking public space and leaving loads of mess.

- 3.3d /f The housing beyond Beaconside is a long way from any facilities and like the housing near the Crematorium is only usable by those with cars as buses are few and far between and in some places missing or very infrequent. Beyond Beaconside was supposed to be built to allow a circular route for buses but this was not enforced and roads built too narrow. We have come across a couple of cases of families leaving because they did not like living on the new estate.

- 3.3g New housing in Stafford is OK but not of exceptional environmental character.

- 3.3x ff Strategic network of accessible green space. If only. Since coming to Stafford in 1994, large numbers of open spaces have been fenced off and made inaccessible.

Think of the Sowe flood plain E and S of the town off Roverway. Think of the sports field off Silkmore Lane. Think of the Grammar school playing fields taken over by Tesco etc. Think of the proposed development by the station. Think of the new Rugby Club. And the old Rugby Club. Etc

- 3A Should the vision change? Perhaps yes because overblown and not being implemented. A briefer statement might be more likely to be implemented
- BUT Fig 3.1 – the proposed vision is lacking in
- a) all kinds of recreational, sport and community facilities which are needed to minimize the need to travel and to make the new housing a good place to live. It is not enough to say recognize global warming/climate change issues. What are you going to do about it?
 - b) in connection with this, the aim in Section 3 to provide another 10% tree cover will need some land use planning. This is not just the odd field that a farmer can spare or put to timber production. A policy/vision needs to exist about the need to balance plantation for timber and the re-creation of natural woodland with a full range of local biodiversity. The plan needs to contain measures for linked green infrastructure to support biodiversity because isolated habitats eventually produce local extinction.
 - c) Our vision should include preserving and enhancing the hedges, woodland and open green space we enjoy.
 - d) The vision should continue to include provision for affordable housing, gipsy and traveller sites. (But perhaps they are later in the plan).
 - e) I don't see Stafford operating as an enhanced service centre in the wake of Covid 19. There are already far too many historic buildings in the Borough which are lying empty and which it would be energy efficient to bring back into use rather than letting them rot and all the embodied energy of new buildings would mean no overall energy saving for many decades.

It might be good to delay consideration until the outcome of Covid 19 is known. Will we have just 20k deaths nationally in which case little needs to change or will there be a surplus of housing released by those who die? And more likely will there be huge numbers of businesses and industries gone to the wall leaving a surplus of reusable for sites and buildings for many years to come. We should not be allocating new green fields when there are loads of brown-field reusable constructions and sites.

3B 3.8 Yes. But see comments above. Statements could be crisper.

3C The existing vision is pretty strong. Problem is how to implement it. Addressing climate change is serious and essential.

Key objectives:

- 8 New mixed-use retail centres for Stafford: not needed. Need to revitalize existing ones. Retail likely to shrink in favour of online – especially as result of Covid 19.

- 16 Upgraded electricity distribution probably needed for Stafford and everywhere else if we move to electric cars.
- 3D: Probably
- 3F: Probably OK if you achieve the stated objectives.
- 4: Sustainability Matters has submitted comment on this chapter.
- 4A Extra requirements for affordable housing should be limited to those that are cost effective over a short time span whereas housing above a certain specification should be required to have a fuller range since the purchaser will have additional financial capability. The most expensive houses should be to near passiv haus standards.
- 4B/D More scope for wind turbines in rural areas. Identify acceptable sites/areas?
- 4C Ground source or air source heat pumps on larger new buildings and houses. Both are expensive. Ground source not suitable for affordable housing.
- 4D All suitably orientated and unshaded new roofs should have solar panels.
- 5A Probably yes. Good to retain. Applicants, (and I too) will not know of the change in Planning Inspectorate's view. In light of the recession likely to follow Covid 19 there needs to be some more restraint on laissez faire in order to build out existing permissions in a diminished economy.
- 5B: Housing requirement: whatever is chosen it should include the existing permissions which you describe as a discount. If there is massive underoccupancy due to conavirus, targets should be reduced in proportion.
- Scenario A: Probably too low as no allowance for outmigration from more crowded conurbations and from international in-migration which will probably ramp up by 2040 from excess heat and drought in more southerly countries.
- I think PCU's should be ignored as I see no way the financial situation of 15-34 year olds will improve. This would require making university tuition free again – unlikely with the Govt borrowing to the hilt to deal with Covid 19. But Scenarios B/C also make no allowance for increased international migration triggered by climate change.
- Scenarios D/E are predicated on ramping up employment. I think this is wrong especially if large numbers die or simply because many businesses are likely to fold and leave their premises unused. Even allowing for international in-migration.
- Scenario F: Ten years ago Stafford needed to ramp up employment to match its projected housing needs and both housing completions and jobs soared ahead. Things were different then.
- Personally, I don't think there are now the resources to add the community and recreational needs of a new population. So I am opposed to scenarios F and G.
- In conclusion I think a target of 408 dwellings a year is probably about right.

5C

Yes full discount should apply in both cases.

Looking ahead, I think the world economy will tank and UK and locally a great many businesses will go to the wall. Franklin Roosevelt dealt with this in the 30s by public works but I don't think any govt supporting its people through the current crisis will have the stomach for funding massive public works. (Should we do HS2 or spend on more immediate and useful needs?)

Post 1945 there was a similar crisis of international and national liquidity which was solved by the Marshall plan. Loans were made at favourable rates to get Germany going again. One could see this happening again were it not for most affluent nations having tanked their economies at the same time.

I think there will be prolonged recession and austerity and we may need an even higher proportion of social housing if much of the entrepreneurial middle class lose their wherewithal and can't afford their housing. Reducing the discount in the expectation that more 18-34 year olds currently struggling will be able to get on the housing ladder seems very unlikely and I don't think it will be any better for upcoming generations in the UK who will face a growing pension burden and will have to make do with a smaller slice of the cake. I can see even the Tories relooking at the case for social housing.

It was always foolish to do away with social housing which helped those who could not afford to buy. This is because in the long run social housing, (where rents are reinvested in repairs, upgrades and new stock) can be run at a profit as inflation erodes what has to be paid back. Particularly if we can develop 3D printing of housing as is starting in China - to "build" concrete toothpaste houses at much lower cost. Perhaps not the best - think of the disasters of "No fines" concrete - but perhaps we have learned to do it better.

Private renting with higher than affordable rents will add enormously to public debt if we provide housing benefit in an era of mass unemployment - as now looks likely with COVID 19.

Table 5.3

When I look at table 5.3, I see that development of key villages has gone hand in hand with local employment opportunities. All the ones over 18% have some attached business parks etc and those below do not. There is logic in this. I would be very happy to allow every village say 6 -12 dwellings for natural growth for local people, half of which affordable. [This would require funding affordable/social housing by public loans rather than Section 106 etc restraint on house builders.] This may seem unlikely today but the post Covid 19 world will be very different.

5.17

No reason why housing should not be allocated to Barlaston, Meir Heath and Forsbrook which have viable local communities far better than say beyond Beaconside. But I don't know the Green Belt Boundaries. Perhaps a case for incorporating these communities in Stoke on Trent. Otherwise review Green Belt boundaries in order to allow these communities natural growth as per NPPF.

P46

Settlement hierarchy: We should go on discouraging development of tiny hamlets without any services. You cannot discourage car use if you allow this.

Settlement boundaries: Stone is getting near the limit of size for minimizing car use.

5.20 A counsel of perfection!

5D Yes. But where are Barlaston and Yarnfield on p 49? Ah I see: Green Belt.

5E Yes.

5F The only one I consider seriously undesirable is Intensification round the edges of larger settlements. This is because of the lack of anything but housing in existing town extensions.

An omitted scenario is intensification of suburban locations which are better served by community facilities than edge of town developments. I would be happy to go for a combination of any of the others. Garden village a nice idea. But usually best tacked on an existing village.

5.34 Garden Villages: For me the choice is between (3), (5) and (6). Of these (5) Coldmece has the greatest potential. It is not so cut off from the village facilities as at Hixon (where the industrial estate intervenes) and there is considerable brownfield land could be brought back into use. (3) Seighford is a bit lacking seeding community facility. 5250 dwellings is enough for community facilities of its own but I remain sceptical as to whether they would be affordable or provided. Its also very out on a limb for potential public transport. Cold Meece/Swynnerton has much more through route bus potential to Stoke and Stafford.

Cold Meece if built should have an access loop within it to allow bus route through it even if only part of the housing built initially.

Fully rural land off the A518 and A34 are non-starters for good places to live. I also suspect the A34 Stafford entrance down Stone Road will become totally congested by the Western access route past Lidl. There's enough extra development to the north of Stafford for the road network.

I very much like the idea of a garden village at Cold Meece as providing a substantial part of Stafford's housing need over the plan period together with potential for community facilities.

5th April 5G Coldmece. Loads better than the other options – see above.

P58 Growth Option 3

5.59 Corridors: A34 and A51 are the only ones to seriously consider because of the need to upgrade the infrastructure on the other routes to service the developments. Have mixed response to this due to danger of ribbon development and coalesced communities.

5H Yes. Alternative option see 5F – suburban growth.

- Ps 66-76 Growth scenarios: In the light of
- a) a 7% likely recession as reported today and unemployment higher than in the 1920's (15th April 35% recession expected!)
 - b) a likelihood that we shall stay with more home working and digital conferencing after the pandemic
 - c) that vacated premises and sites can be reused
 - d) that international migration may stall from threat of pandemics
 - e) that it will take a long time for the economy to revive
 - f) that the oil industry may be decimated – and not revived in the light of addressing the climate change world emergency
- the only scenario we should plan for is on page 69 408 dw/a with discount and without PCU. If we need PCU we can add it later but that's unlikely.
- 5I Yes but only because an obvious appropriate site presents itself being substantially brown field.
- P78 5K Local Housing need 408 dw/a gives requirement of 70ha which should be about right – at the lower end of the options. Past rates were much higher for a very different unemployment scenario when Stafford was looking at losing RAF base, university, hospital and prison. RAF replaced by army with much associated new housing; university is springing back to life; hospital was somewhat reprieved by going in with Stoke. Prison might not get replaced in upcoming era of further austerity. The unemployment future looked dire 10 years ago but now we have full employment in Stafford and don't need employment land catchup.
- 5L 70ha includes 16ha for potential loss of sites and closures. This seems reasonable.
- 30% offices on these new sites is probably way over requirement if we commit to reuse vacant central office premises to support traffic reductions needed to address climate change sustainability and also adapt to the post COVID 19 world. I suggest 10% offices on new sites.
- 5M Yes but if a garden village is introduced at Cold Meece, ideally it should have accompanying industrial estate to allow walking to work. (Alternatively and less good, expand ones along the Eccleshall/Swynnerton Road.) Maybe 20 – 24% of the requirement should be at Cold Meece garden village. (Ebenezer Howard said homes and jobs should be co-located for a garden village.)
- 5N Yes but I would scale it back to 70ha overall.
- P82 Where are Swynnerton and Tittensor? List seems incomplete.
- 5O No idea. Don't know what has been proposed.
- 5P <50 dwellings: Best way to treat these may be to generally permit 1 – 3 dwellings a year for occupancy by people living in the hamlet, their families and those working within say 2km. ie only for people well rooted locally. Not supplying settlement boundaries may save a lot of contentious and futile work and allow more organic growth.

- 5Q Would have thought school playing fields should be protected and only built on in exceptional cases or perhaps if a school closes.
- 5.97.5 The only reference I can find to gipsy and caravan sites – and they to be excluded from settlements. The plan needs to have a policy for these sites. For instance: “Private gipsy sites will be allowed in the country and near to existing settlements where they are secluded and not producing nuisance.”
- 6.5 A commensurate increase in job provision. Might not be appropriate depending on outcome of COVID 19, an ageing population and a proportionate lack of higher education (the University having mostly moved to Stoke). One does not want to encourage travel from Stoke and the Black Country to jobs not needed by local people.
- All LEPs have to be ambitious but the world is overusing its resources and COVID 19 may enable us to redefine our needs for stuff as for fewer more durable and higher quality items.
- All LEPs may want to be the best show in town but they cannot all be that and it is not in the best long-term interests of the local community for overblown development that contributes to the degradation of the world and its peoples.
- Local job needs to be monitored and not allowed to get out of step with population growth. There is a great need to adapt and reuse vacant employment space, especially if built to higher standards.
- 6A a) 70ha including “flexibility”. b) see 5L comment.
- 6B a) possibly. b) yes c) attached to garden village.
- 6C Vacant shop and office units in Stafford town centre.
- 6D I would prefer to zone potentially unpleasant uses such as metal recycling, composting activities, noisy manufactures, toxic waste producers etc.
- 6E No. For instance, it may be best to convert some unused shops to residential as I guess online shopping and home delivery post COVID will stay higher than before. But large numbers of industrial units are too large, awkward, uninsulated, ill-serviced, or toxic to be appropriate for housing. Best to respond to entrepreneurial imagination. One might exclude or control multiple occupancy and squatting. All dwellings should pay council tax and be healthy places to live.
- 6F a) Empty shops and business premises. These need to be provided with parking/servicing provision for materials and goods to come in and out. Buildings such as the old employment office on Greyfriars should be brought back into use.
- 6G No. It may be worth encouraging refurbishing, insulating and refitting of existing empty offices. There are plenty of those especially historic buildings of character that belonged to the county. Eg the Carnegie library. The derelict building on Foregate St near the Quaker Meeting house. The old unused buildings on Eastgate Street. It is important to allow and provide some parking for premises where needed. Its very apparent from the numbers now working from home, that the actual requirements for an office environment are quite minimal and we may be

moving to a sparser provision with much more miniaturized equipment, hard-disk filling, smaller printers etc etc for offices than in the past. In more of the vacant offices may be suitable than was considered in the last 15 years.

- 6.16 Large airy, expensive to heat open plan offices may start to seem like dinosaurs which have had their day. In the post COVID world we have to be serious about reducing consumption and CO2 production or our cities will be under water by 2100.
- 6H Yes but for local enterprises mainly. We need to move to a position where jobs and homes are balanced to reduce commuting.
- 6I Possibly Elon Musk's 12000 satellites might render fibre optic broadband unnecessary?
Probably not sensible to insist that every farm development has superfast fibre optics as it requires much excavation. Not cost effective. We have a rural cottage where a local mast provides perfectly adequate Broadband – far far better than BT which we had previously. Supply fibre optics to industrial estates by all means.
You might want to control the bulk/size of rural industrial structures and decide case by case depending on location to protect attractive areas and local biodiversity.
- 6J No. 6K Don't know.
- 6L Visitor economy: Beef up the bus networks???
- 6M/7.2 I wonder whether some of the need for rural office development could be met and support struggling farms by converting underused farmhouse rooms that used to house farmworkers onsite. The letting income could help sustain marginal farms. Since the reduction of agricultural workers since the last war, many larger older farmhouses have loads of spare bedrooms that might be reclaimed. (A climate friendly solution.
- 7.2 Far too many out of town centre permissions for retail have been given. Too many empty town centre premises.
- 7.3 13926 of comparison floor space: How about using the closed Stafford Coop Department Store and the closed Marks and Spencer building?
- 7A Agree with shopping hierarchy. Permit rural village convenience outlets if any think they could be viable. Do not increase comparison floorspace. Reuse Coop department store and M and S before allowing new permissions. Try to concentrate shopping outlets within central ring-road in order to maximize potential public transport access. Note that more and more comparison shopping will be done online -see how people now buy cars online without driving them. This sort of thing likely to increase. Especially post COVID.

- 7.4 Agree we need more long stay parking, especially for evening entertainments. Try to reopen the new Kingsmead carpark for longer stays in the evening, even if paid for, to support the Gatehouse Theatre.
- 7B a) Yes. b) not sure how larger and smaller areas will be distinguished policywise. If Tesco's is part of the town centre, why not Madford centre/Lidl? Eccleshall shopping area seems very tight to accommodate the increase. Stafford really ought to use empty properties/existing sites first + extra useful parking since nearly all existing parking is limited to 2 hour slots unsuitable for enhanced recreational and restaurant trade. Required retail space likely to fall after COVID>
- 8A Prioritize brownfield land.
- 8B/C Density: Perhaps to encourage affordable housing, one should insist on a %ge at higher density. I would like to see more urban forms in towns ie terracing, squares and the like. Particularly near transport hubs.
- 8D/E Perhaps. Many middle range housing estates are really cramped with lack of space for cupboards/storage. But better design and use of whole height wall storage can ameliorate this. Have seen this work very well in 2 room accommodation in Hungary – fewer more spacious rooms with back to back full height storage very good on small footprint. Beds folded out. Most middle range houses today are way below Parker Morris standards which provided good living spaces when used.
- Having looked at the Nationally Described Space Standards, they seem to approximate to Parker Morris. A typical 3 bed interwar semi would have 850-1000 sq ft with Parker Morris and NDSS at the upper end. Proposals smaller than NDSS would need higher quality design to maximize living space.
- There should be a presumption of NDSS for all dwellings with the local authority reserving the right to refuse designs with lower standards but able to approve where very well fitted. (One can do a lot worse than a well designed caravan at much lower footprint.)
- In the past one sometimes had bedsits in sheltered housing but most of these have been phased out as having too little accommodation but housing associations are exploring 350 square foot dwellings for young people which might be well fitted bedsits.
- 8F/G Proposed mix OK. But note that in the era of bedroom tax you will need a proportion of downsizing accommodation for elderly with enhanced sizing for 1 bed accommodation in the social housing section to allow for the accumulation of possessions over a lifetime. Such things often went in a spare box room which is not covered under universal credit/bedroom tax rules. One could for instance imagine properties 1 up one down with good sized rooms and a lift being attractive for some elderly people and possible in terraced form to allow small outside spaces. Bungalows tend to be space intensive with grounds larger than some elderly can or want to manage.
- Stafford feels quite overwhelmed with care homes and sheltered homes at present. Ideally there will be some provision in all areas of the borough.

- 8H As a member of Stafford District Access Group, I consider that the Planning Practice Guide as stated is seriously defective. Only a small proportion of homes for people with disabilities need full adaptation but disabled people will also wish to visit family and friends in ordinary housing. All ordinary housing should therefore be built to Lifetime Homes Standard. They should have extra width front doors, level thresholds, downstairs toilets of sufficient size for a walking frame and grabrails. Also room to manoeuvre a wheelchair indoors. These are the most important elements in lifetime homes and not expensive to include when built. Some of these items are now mandatory.
- 8H So all new dwellings should be wheelchair accessible.
- 8I A full specification lifetime home will have provision for a through floor lift. Bungalows are popular but costly of space and often have too much outdoor space for elderly residents to manage. So specify bungalows or lifetime homes in proportion as required. There may be more call for bungalows in rural areas where residents are accustomed to garden and grow fruit and veg.
- 8J Depending on the success of the new institution, there may be a need for more student housing by 2040. The matter should be kept under review and a site allocated in case it will be needed.
- 8K With a housing figure of 408/annum and an aim of 210 affordable units, this is 50%. I doubt Stafford has come anywhere near this in the past. Section 106 provision and the ilk usually says up to 40% much of which has been forgiven in Stafford in the past.
- In the light of COVID 19, there will be many more struggling families in future and we should be aiming for 50% affordable. We should not vire this to affordable housing to purchase. More people will need to rent and ideally in the public sector.
- 8L Rural areas require small numbers of affordable dwellings to provide for the needs of the communities. The plan should allow this or even encourage it.
- 8M Yes.
- 8.32 Gipsy and traveller sites: Provision should be made for the needs identified. Its not enough just to make a study of this.
- 8N Self builders are individualists and would probably prefer not to be on large estates of similar housing. Therefore it may be better to set aside a few sites for self-build and reserve the right to ask a developer to make up to 5% of sites available if there is demand. A blanket provision may not match where this limited number of people want to live. Suppose you set aside 5% of 250 dwellings a year for self-build. In two years you would have satisfied all the existing demand. Therefore 5% flat allocation is far too much. A more flexible solution is needed.
- 8O Self-build OK in smaller settlements. Should be limited to people who intend to live in them rather than planning to sell them at a profit.

- Section 9: Quality Development is about quality of community and not just appearance, greenery and sports. It requires health facilities, and local meeting places.
- 9.5 Omits woodland. Important when you want to cover 10% of the Borough with trees.
- 9A a) perhaps yes but unlikely to make a difference
b) identify missing links in the green and blue network. Yes this is important.
- 9.11 Not relevant but Trent is to the East of Stafford Town. Statement is incorrect.
- 9B May need a dedicated member of staff.
- 9C Yes to all.
- 9E No. All developers seem intent on removing every speck of green before building. You need much more draconian measures to protect mature trees and hedgerows when developing sites. There's no indication that friendly policies have done anything to protect trees. Ancient and veteran trees should be specifically protected.
- 9F Not sure I see the point of this. Gardens provide the most convenient place to grow food and as the population ages, smaller plots are desirable. Planting trees on temporarily cleared sites makes little sense if they are cut down before they reach their prime. Some new planting should be allocation to wood pasture with open glades to aid biodiversity. Plantation stands of conifers do not support biodiversity. I am happy to go for an extra 10% tree cover – but mixed woodland.
- 9G Why not?
- 9H Yes but most distant views are pleasing. Not sure one could specify better spots for this.
- 9I Historic assets. Yes to all. But this is a course of perfection. Probably only in a few cases can it make a difference.
- 9J/9K Design Guidance and shop front policies: Probably OK. Very difficult to legislate for attractive urban design.... Fragmented or monolithic arrangements can both be variable in quality.
- 9La) Regional Expert Design Panel? Probably not allowable under present rules approving everything possible to support the economy. I suspect this would not be manageable. Lots of developer claims for damages.
- b) National design standards? Not sure this would improve the sense of place. Likely to produce national sameness.
- c) Incorporate local characterization. This needs doing if new buildings are to fit in historic contexts.
- 9M Local Green Spaces: these need identifying and protecting and required when developing larger sites. Only more interesting ones need identifying and protecting in new development. New green spaces can and do develop as part of developments.

9N S Paul's parish Forebridge used to have lots of accessible open space. In the last 20 years it has lost access to the Riverway fields and walks, the police sportsground, the Grammar School playing field, recreation facilities at St Leonards and Areva sites. The Borough seems intent on fencing off open spaces. In particular the Sowe and Penk riverbanks should be accessible for recreation.

In my view public sports facilities standards are likely to be excessive for the aging population. Indoor recreation equally as important.

The northern side of Stafford is however very short of facilities. Bowling Green and tennis court closures in Littleworth. No tennis to my knowledge in north Stafford.

9N b) toilets in areas without public toilets

9N i) links to walking and cycling infrastructure: There should be direct walking routes in and out of new developments. Many places effectively compel car travel for all journeys by not providing efficient walking routes. Beware "Secured by design" controls which empod new estates and close up or do not permit walking routes.

9N j Possibly. Perhaps all flats should have balcony access/ French doors to fresh air open to sunlight.

9O New estate areas should have some space set aside for recreation even if facilities are not provided.

Extra swimming would be nice but unlikely unless funded by local authority as most gym pools in the area have closed. Ie this is not a realistic future unless central govt starts funding local govt provision.

10A a) All new houses should have access to an off-road car charging point within say 100 yards of home. It could be in a shared parking area.

This may require major investment in upgrading the national and local grid supplies.

b) Yes. All major development should be accessible by regular public transport and this should be enforced by inspection and fines. Stafford Local Plan previously said all new housing should be within 5minute walk of a bus. Many bus routes have closed or thinned but priorities might change and all development should have the potential for running suitable buses within about half a kilometre.

c) Air quality may be "legally binding" in theory but actually fairly uncontrollable. We can only progress by making electric charging more accessible and electric cars cheaper.

d) Preserve/protect all mature trees and extant hedgerows. Survey for protected hedgerows.

10B NO2 protection probably best addressed by national legislation on exhaust emissions. But protecting mature trees and hedgerows might help. Bear protecting designated sites when planning the location of reforestation/woodland planting.

- 10C I recently visited the MRF and ERF Veolia facilities in Four Ashes which Stafford uses for some of its waste. This facility is working towards zero waste to landfill. The intention is that all waste will be repurposed. Therefore the figure of 52.02% recycled quoted is almost certainly incorrect. However we were told that the MRF plant has a capacity limit which is being reached.
- The Borough is responsible for waste collection but not waste disposal which is a county matter. Hence the Borough should urge the County to further explore expansion of Veolia type MRF/ERF facilities it could use.
- What does not go to Four Ashes goes to the Stoke incinerator or the composting near Chebsey. I don't know if there is MRF at Stoke and this could perhaps be provided if not.
- 10D Light pollution: there is a passing reference to this in 10.2 but no policies mentioned. I would suggest:
- a) lux limitations on all outdoor lighting visible from roads. Roadside floodlighting can blind drivers when too intense.
- b) All floodlighting should be 3500deg not 6000 deg spectrum in order to shield wildlife from sleep disturbance. The Jaguar Landrover lighting in the Stone carpark is potentially very damaging to wildlife. (ie use warm not blue light.)
- (This also applies to street lighting for humans. Please advise the County.)
- 11 I am not persuaded that a local plan is the right place to address Health and Wellbeing issues but if it is the proposals should be specific: such as
- All homes to be lifetime homes.
- All hedgerows affected by development to be species recorded and preserved.
- All mature trees to be preserved unless demonstrably unsafe.
- 12 Policies have included reducing the need to travel for some years but none of them have. Will we behave differently after COVID 19? Work from home more?
- 12A Yes. Not much in our control. "Renationalize" buses or set up public local bus services. Nothing else will make much difference. Oh, and stop encouraging out of town shopping and industry. The garden village idea will be helpful towards this policy as it would make public transport to Stafford, Stoke and Stone more viable.
- 12.7 The lack of access to one side of Stone Station needs addressing.
- 12D The attempt to limit car ownership and use by restricting parking on estates and in town centres is doomed to failure. There needs to be massive investment in public transport, shared ownership schemes and the like if traffic is not to increase in line with dwelling and population increase. Minimum standards should be set. At least one off road place per new dwelling + on street parking or carers and visitors etc.

Non-residential: you might be able to offset parking needs with more public transport.

Ideally all private parking schemes in towns like Stafford would be under public control with public benefit from the income. This would allow much better matching of provision and requirements. A Utopian dream I am afraid. Private parking charges and restrictions may be draining the lifeblood from Stafford Town Centre and forcing more and more shopping online. The ambition of more town centre recreation and restaurants needs support by kinder parking time limits. 2 hours may be too little for a show or a meal or both.

12E Yes a policy for radio masts is desirable.

13 CIL. I would like affordable housing delivered by local authorities as in the past self-funded by long term loans and rents. This would make it easier for Section 106 to provide suitable facilities without rendering schemes non-viable.

14 Monitoring: OK

MR R PRICHARD EMAIL RESPONSE – 17 APRIL 2020

From: Rob Prichard [REDACTED]
 Sent: 17 April 2020 11:51
 To: List-ForwardPlanning-SBC
 Subject: The Draft Local Plan for Stafford Borough 2020-2040

I have considered the detail of the comprehensive Draft Plan and make the following comments, some being in favour of it and others against. They are as follows:

- 1) In Question 8A it states the NPPF suggests that Plans consider prioritising Brownfield land over Greenfield land to preserve the countryside and area itself. As you must be aware Staffordshire is famous for farming and has historically encouraged young people to enter the industry by providing good land which it owned available for them. This is most important and should be included in the Plan not only for that reason but also because it plays an important part in helping villages to be kept apart and stops them becoming small towns.
- 2) Section 5 of the Plan, and especially Table 5.3, is also very important in that it relates to clause 1) above.
 The percentage figures shown in this table are misleading in that the population figure of each KSV is not given. Consequently, while some increase in number of dwellings' percentages are a lot higher than others, the actual numerical housing growth is not apparent and the result can be that larger KSV's are growing even larger than the smaller KSV's than they already were. The outcome of the larger KSV's growth is that they eventually join up with villages and become small towns. This should be avoided at all costs.
 (Note - It was pleasing to see that the "Number of Dwellings completed" for Gnosall has been amended to the correct higher figure)
- 3) Question 5D of Section 5.20 proposes that smaller Settlements should be included in the KSV Hierarchy for the first time. This would enable a fairer distribution of housing, some smaller settlements having better facilities than some designated KSV's.
- 4) a) Section 5.2 also includes a proposal to develop a new Garden Community and lists 7 possible sites of which the first two both involve Gnosall with the second additionally including Haughton.
 It should be noted that part of one of these 2 sites, if selected (The Horseshoe/Loop) is currently outside the Gnosall Settlement Boundary. While a Garden Community, of itself, would not be unacceptable it should not be located next to or very near to Gnosall as it could create a town which would not be acceptable. This situation would, it seems, be most likely to include the use of sites 1 and 2.
- 5) Gnosall itself, as a result of the Stafford Borough Plan 2011 – 31, being imposed on it, had more than its fair share of new housing developments without any improvement in its facilities, e.g. parking, roads etc. As a result there is an obvious greater and constant strain being put upon them and this was happening in the normal course of activity before the present lockdown. The same is being experienced on the A518 main road which is extremely busy with every kind of vehicle, large and small. This applies in both directions, viz to and from Stafford and the same in the westerly direction to Newport. At the same time, North to South routes into and out of

Gnosall, being lanes, are far from suitable for the level of traffic that has to use them.

I hope you are able to follow my Section referencing and that my comments are of some assistance to you.

J R Prichard.

A H and M E KALAGA EMAIL RESPONSE – 20 APRIL 2020

From: Maria Kalaga [REDACTED]
Sent: 20 April 2020 23:09
To: List-ForwardPlanning-SBC
Subject: New Local Plan 2020-2040

Dear Sir/Madam,

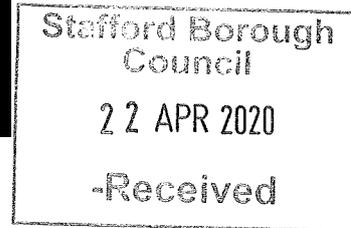
Thank you for the work you have done in bringing together the New Local Plan 2020-2040. I would like to present the following comments regarding Gnosall.

The Loop is outside the settlement boundary and therefore neither suitable nor should be included for building development. The highway access to The Loop is limited and would pose not only a congestion hazard but also potential safety risk.

The proposal of a Garden Village potentially linking Haughton and Gnosall (incorporating The Loop, Moat Farm and other fields along the A518 as suggested in the map of potential sites), neither of the villages have either the infrastructure or the potential for providing satisfactorily the infrastructure to support such development. It should also be considered that services such as the local school is at full capacity and there is only one doctors' surgery and there is no post office. Additionally, such a development would undoubtedly result in much heavier traffic on the main service road (A518) which is already a dangerous road. Furthermore, such a development would exacerbate the tendency for flooding in this area.

Gnosall has already had recent major housing development (over 200 houses). The redevelopment of brown field sites should be the preferred option rather than the use of farm land. Staffordshire is proud of its farming heritage and farming reputation. The above mentioned proposal is all situated on farm land. Furthermore, the suggestion that such a development would create creating many jobs is without any foundation without new business coming into the area. Recently, in spite of the above mentioned housing development, Gnosall has lost its travel agent, post office, butcher and greengrocer shop due to lack of sustainability.

Yours sincerely,
A H & M E Kalaga



20th April 2020

Dear Mr Yendole

STAFFORD BOROUGH LOCAL PLAN 2020 – 2040 – RESPONSE TO ISSUES AND OPTIONS DOCUMENT: LAND NORTH OF TRENT ROAD, STONE ('LNTRS')

We are the owners of a parcel of land known as '*Land North of Trent Road, Stone*' (LNTRS) (the '*Site*'). The Site lies within the town of Stone and extends to 1.67ha. The land is shown edged red on **Appendix 1**.

The Site has been actively promoted for residential development for around 30 dwellings. The planning history and the sustainability credentials of the Site are explained later in our letter. This letter is accompanied by the following Appendices:

- **Appendix 1** Red Line Plan showing the extent of the LNTRS;
- **Appendix 2** Drawing no: 00482 PL (0) 11 Illustrative Development Layout; and
- **Appendix 3** Stone Settlement Boundary shown amended to include the LNTRS.

We are grateful and thank the Borough Council for this opportunity to respond to the Issues and Options Document (I&OD) and we do so as follows. Where we have not responded to a question we have no comment to make.

Section 3: Questions 3.A – 3F Vision and Strategic Objectives: Paragraph 3.3

We agree that the existing vision is overly long, and that a shorter Vision that demonstrates the Council's development priorities, as included in Figure 3.1 Page 27 of the I&OD is more appropriate. The shorter version that better reflects changes to the role of town centres and the global climate change emergency, is more relevant.

It is noted that the Key Objectives for Stone (Page 29) do not include an objective that sufficiently requires developments to be of the highest standards in terms of design, materials and how the development integrates within the environment. Design standards in the area have deteriorated recently and we request that the additional objective, as set out below, is included in Stone's Key-Objectives:

- **Key Objective:** Design should be sensitive to the local surroundings and by the use of architectural style and materials, enhance the attractiveness of the area.

The shorter Vision underpinned by spatially-focused objectives, as included at pages 27-30 of the document will assist in defining planning policies and development outcome.

Section 4: Questions 4.A to 4E Sustainability and Climate Change

We agree with and support the Council's general objectives in response to climate change. The Council needs to make clear as the Local Plan emerges what its aspirations in terms of carbon reduction are, and at; 4.11, Page 34 of the I&OD explain what '*carbon neutrality*' actually means; and at, 4.16 Page 35, what a '*a low carbon and renewable energy network*' is.

Small scale developments should not be overburdened with obligations that could result in an unviable site. It is important that the fundamental sustainability criteria of 'location' that promotes residents to use other modes of transport than the private car is not overshadowed by the need to provide construction mitigation, in the form of renewable energy sources. The fabric first approach, to ensure conservation of energy should be at the top of an energy hierarchy. We do not believe that Building Regulations need to be fundamentally changed to achieve this.

Motor vehicles and transport are undoubtedly the second worst global polluters after passenger aircraft. Their carbon emissions are a danger to human health and a major cause of climate change. All the council's vehicles – cars, vans, buses and lorries - whether owned, hired or under contract should be converted to run on zero-emission bio-methane produced from organic food and animal waste in Maltin System anaerobic digesters.

Further, all residential developments should include vehicle charging points to facilitate electric vehicles to reduce pollutants that harm human health.

Section 5: The Development Strategy.

Questions 5.A - The Presumption in Favour of Sustainable Development

We consider Policy SP1 fully addresses the requirements of the NPPF and believe it should be retained.

New Garden Community

We implacably oppose even the contemplation of a new garden community which we consider would cause needless urban sprawl and ruination of our Borough's glorious countryside.

After the recent High Court ruling over Heathrow which found that expansion plans had failed to adequately account for policies on climate change the impact of environmental policy within such provision has become fundamental. Widespread genuinely-held concerns surrounding such large development proposals will invariably attract increasing opposition. The Council will be on a collision course with campaigners and it will be 'open season' for numerous objectors who take a 'not in my backyard' approach to such development. That, together with the rise of and now frequent use of endless legal challenges, would make delivery of exceptionally large housing numbers wholly dependent on the outcome of judicial reviews in both the High and Appeal Courts. This would lead to endless delay while legal challenges are decided by the Courts making certainty and timely delivery of housing from a new garden community problematic and impracticable.

Over-reliance on large strategic sites, such as New Settlements, where viability issues, and long lead in times can frustrate delivery, put at risk the Council's ability to maintain its 5 year housing land supply that can lead to speculative development in unsustainable locations. Delivery of housing numbers within the plan period would therefore become uncertain and an unwarranted

risk. Further, it is crucial that the *'partial catch up'* rates are included in the Council's housing number, to ensure that the number of houses delivered truly reflects the potential new household formations.

It is considered that land supply and housing numbers can be better guaranteed in other ways, than new settlements, as instanced below.

Question 5.D The Sustainable Settlement Hierarchy:

It is important that development is directed to the most sustainable locations, while ensuring that smaller settlements are able to take an appropriate and proportionate amount of development.

We support the revised Settlement Hierarchy at Table 5.4, Page 48 of the I&OD that identifies Stafford and Stone as the most sustainable locations within the District. We support the inclusion of the smaller settlements within the hierarchy.

Question 5E: Northern Areas of Borough:

We fully support the Council's intention at paragraph 5.43 that to "permit some development, settlement boundaries will be drawn around" the Staffordshire Northern Urban Areas "to allow infill and the redevelopment of land contained within those settlement boundaries".

Question 5.G: New Garden Community/Urban Extensions:

We have already mentioned that the over-reliance on large strategic sites can jeopardise the delivery of sufficient housing to maintain a 5-year housing supply, but appreciate that it is unlikely that smaller sites will be able to generate the infrastructure needed in relation to the housing numbers.

We do not support a New Garden Community, but if housing numbers make this an effective alternative, brownfield sites should be the preferred choice.

Question 5H: Growth Options:

We agree that the only NPPF-complaint Growth Option is either Growth Option 3, 5 or 6.

We fully support the Council's Growth Option 3 to disperse development across the new settlement hierarchy growth directed at urban extensions with a range of medium and small sites being allocated at Stone. We completely support the Council's policy 5.43 that to "permit some development, settlement boundaries will be drawn around" the Staffordshire Northern Urban Areas "to allow infill and the redevelopment of land contained within those settlement boundaries".

It is therefore wholly logical, reasonable and sensible that Stone's settlement boundary which, as drawn, is in parts illogical, incongruous and inappropriate is given serious consideration during this plan process so that anomaly is corrected and the boundary amended. How the boundary should be redrawn is discussed later in this letter.

We support the Economic Scenario G as set out in Table 5.8g, which see a jobs growth of 8,530 and 5,970 dwellings (Including PCU). The number of dwellings to be delivered in Stone in this scenario is around 735.

Stone has grown enormously in recent years but we nevertheless accept there is a need to address the current chronic housing shortage. We believe an additional 700 new homes in the plan period for Stone would be appropriate.

Question 5.I:

No; a Garden Community should not be included in the new Local Plan for the reasons set out earlier in this letter.

Question 5.J:

We support the following combination:

1. Growth Scenario G;
2. Yes, to include Partial Catch up;
3. Yes, to include existing pending permissions in the housing numbers, at a 20% discounted rate to allow for some sites not being delivered; and
4. No garden community should be included in the new Local Plan.

Other General Comments:

Affordability, Affordable Housing Provision and the Council's Rural Exception Sites Policy

We believe minimum density thresholds would have a negative effect in the standard of developments in the Borough and should be avoided.

The Rural Exception Sites Policy C5 of the SBLP 2011 – 2031 which allows affordable housing on 'rural exception sites' is in our opinion one of the most important Plan policies. This will help support the needs of local people and ensure sufficient homes are available for the next generation on those rural areas of the borough where they are needed the most and where people really want to live. This will help sustain rural communities and help address the current chronic housing shortage particularly for the seemingly unending demand from young first time buyers. It has the potential to bring about economic, social and environmental benefits throughout the Borough which would not otherwise obtain.

Land North of Trent Road, Stone.

In its response to the Stone Neighbourhood Plan consultation Stafford Borough Council itself described the Land North of Trent Road, Stone as having the "*potential to contribute to the future sustainable development of Stone*".

The LNTRS consists of two contiguous parcels of land extending in total to 1.67ha. The 'Woodland Court' area extends to 0.42 hectares and lies to the west of the Site and the 'Woodland Fields' area amounts to 1.25 hectares of the Site and lies to the east.

The Site lies in the north west of Stone and will be accessed from Trent Road. The Site is surrounded by residential development on three sides, with Hartley Close and Newcastle Road to the north and east and the new Meadowside development to the south. The Site is bounded by Trent Road to the south and the A34 to the west.

The principle of LNTRS for residential development has been long established in the expired

planning consents and Local Plan allocation, as set out below:

- 'Woodland Court' gained resolutions to grant outline planning consent subject to a s.106 agreement in October 1989 (application no. 24130) and detailed consent for 28 dwellings in November 1990 (application no. 26033);
- 'Woodland Fields' also gained resolutions to grant outline planning consent subject to a s.106 agreement in October 1989 (application no. 24130) and detailed consent for 11 detached 4- and 5-bedroom dwellings with separate garages in October 1991 (application no. 27035);
- The Land North of Trent Road, Stone was allocated for housing (HP17) in the Stafford Borough Local Plan 2001 – 2011 and also in the 2013 Housing Monitor 'Land for New Homes' for "39 dwellings". The allocation was revoked soon afterwards; and
- A further planning application was submitted in 2015 - (Application No. 15/23033/OUT) - for a residential development on the Woodland Fields part, as shown on the attached Illustrative Layout (**Appendix 2**). The planning application was refused as the housing numbers for Stone included in the Local Plan, had been met. An appeal was submitted to the Planning Inspectorate and dismissed for the same reason.

There were no technical objections to the outline planning application, from statutory consultees, including: the Environment Agency, the Highways Authority and the council's tree officer. The Site is available, suitable and has no constraints that would preclude delivery.

A Tree Preservation Order has recently been placed on the land though the Council's Tree Officer has informally agreed and accepted there are only approximately 5 trees worthy of protection; these will be preserved or replaced in any forthcoming development.

Our proposal for the development of the LNTRS is shown on the Illustrative Layout (**Appendix 2**). The features and benefits of the Site include:

- The Land North of Trent Road, Stone is an eminently sustainable location;
- All the homes provided will be designed to a very high standard;
- The overall design will reflect the character of the locality;
- There will be a mix of housing types and tenures;
- The development will include not less than 14 affordable low-cost starter homes;
- The layout provides for a footpath which will link to the existing footpath on the south side of the road and mean pedestrians can walk in safety for the whole length of Trent Road;
- The layout provides for land to be donated to the highway authority for road improvements to enable the dangerous and awkward turn into Trent Road from the southbound carriageway of the A34 to be made safer and easier;
- The allocation LNTRS for housing will complement and increase the current mix and range available; both are badly needed in Stone and will help meet the high demand; and
- The Site has enviable transport and highway links and is within easy walking distance of Stone town centre and public transport – both for buses (stops in Newcastle Road) and trains (Stone station accessed by means of the shortcut from the top of Trent Road and across the canal).

Allocating the LNTRS for housing in the emerging SBLP 2020 – 2040 would make the most effective use of what is a mainly 'infill' site in meeting the urgent need for new homes. Developing the site

whose suitability for housing is well-established will contribute to the three roles of sustainable development; the social role; the economic role; and the environmental role.

Sustainable development on the LNTRS would be eminently logical and sensible with Trent Road, the A34 and adjoining housing development providing wholly defensible boundaries.

Moreover given the Council's intention to permit development with settlement boundaries being re-drawn around the Staffordshire Northern Urban Areas to allow infill within those boundaries, we believe strongly that the same principle should apply to the LNTRS which in any case can logically be regarded as an "infill" site.

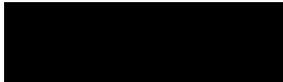
Conclusion

Bearing in mind the above, we request that the Stone settlement boundary is amended to include the LNTRS as shown on **Appendix 3** and that the Site is allocated for residential development in the emerging Local Plan for **up to 30 dwellings**.

Whilst writing we would like to congratulate everyone responsible who helped to produce such an excellent and informative Issues and Options document and also thank them for their professionalism, expertise and dedication.

Should you need any further information please do not hesitate to contact us.

Yours sincerely



Margaret JH Preston



James M Preston

Enclosures

Alex Yendole Esq
Stafford Borough Council
Civic Centre
Stafford ST16 3AQ

Appendix 2 Drawing no: 00482 PL (0) 11 Illustrative Development Layout



As stated in the Planning Statement - where dwellings are proposed that have 4 or more bedrooms, a minimum of 3 parking spaces will be provided.

Additional tree planting to be carried out to boundary replacing existing poplars with less overbearing smaller semi-mature trees as part of detailed landscaping scheme.

The row of trees adjacent to boundary to remain where possible with all poplars pollarded.

Visibility Lines for 30mph Road
40m shown clear from obstruction

Visibility Lines for 30mph Road
40m shown clear from obstruction

NOW DEVELOPED

Site Location Plan 1:2500



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Client: **James M Preston**

Project: **Proposed Residential Development on Land off Trent Road, Stone, Staffs**

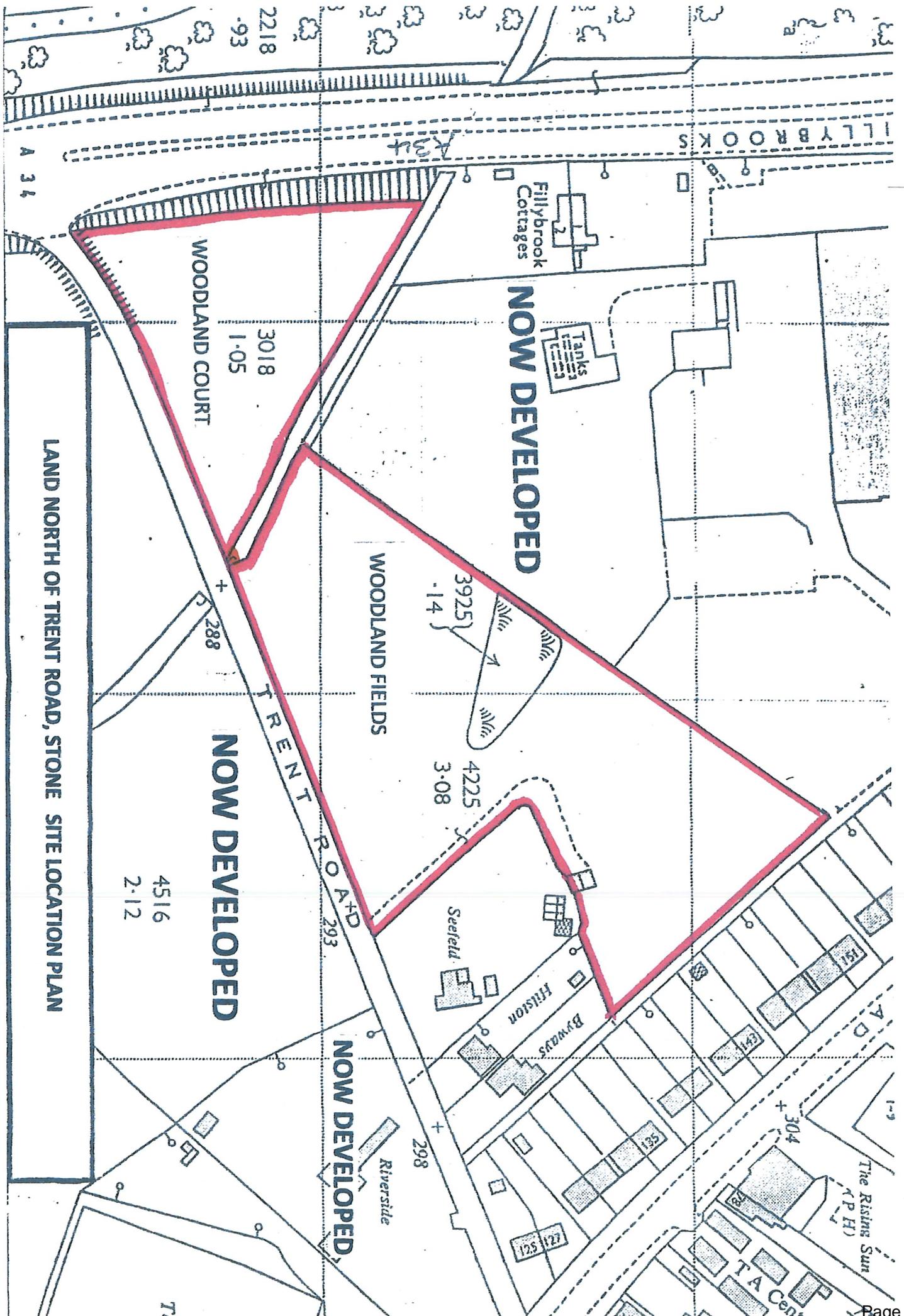
Site: **Site Layout Plan**

DATE: **Apr 2020**
 SCALE: **1:500**

Drawn: **NJH**
 Checked: **CHS**

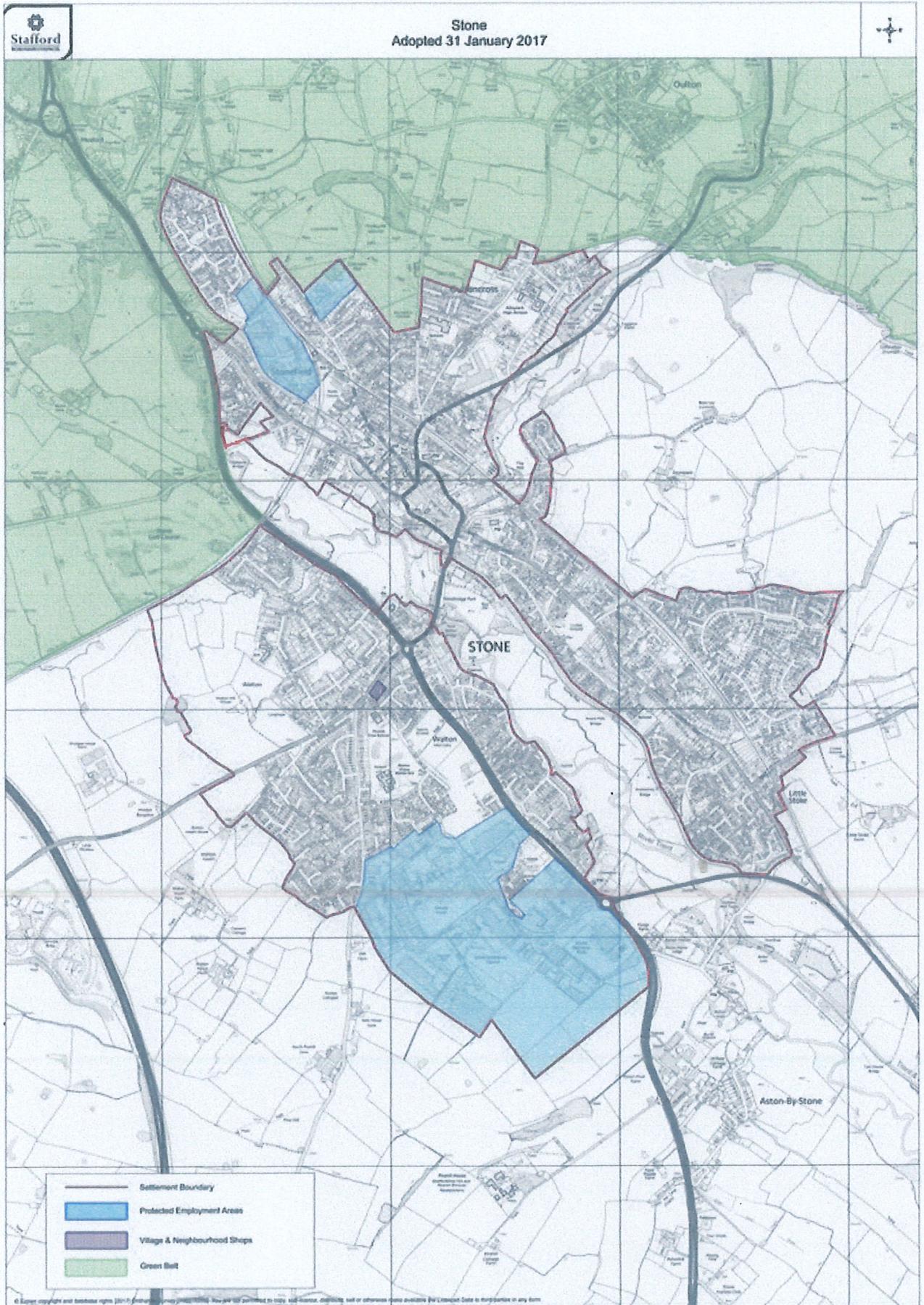
00482 PL(0)11

Appendix 1 Red Line Plan showing the extent of the LNTRS



LAND NORTH OF TRENT ROAD, STONE SITE LOCATION PLAN

Appendix 3 Stone Settlement Boundary shown amended to include the LNTRS



**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	Christopher	
Surname	Dobbs	
E-mail address	[REDACTED]	
Job title (if applicable)		
Organisation (if applicable)		
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

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

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

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

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

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

Please note:

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

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

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name Christopher Dobbs			Organisation n/a	
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph		Table
Figure		Question	3.C	Other
2. Please set out your comments below				
I agree that a new Vision for the Local Plan should more explicitly recognise the need to respond to Climate Change and its consequences.				
The new Local Plan should take a bold and pro-active approach in ensuring that the design, specification and conditions of use of new, re-furbished and adapted buildings (for all uses - commercial /industrial, residential and public/utility uses) incorporate the most efficient and effective energy saving, energy use and energy management technologies and equipment, as well as ensuring that such buildings are resilient to the extreme weather events that are likely to result from climate change. Similar approaches should be used where development does not involve buildings, e.g. sustainable drainage systems for open storage or car parking, energy efficient lighting systems.				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	3	Paragraph		Table
Figure		Question	3.D	Other
2. Please set out your comments below				
As much of the focus of the Local Plan, particularly from the viewpoint of Borough residents, is about the spatial aspects of development it is right that the New Local Plan should include a spatially-based approach to the objectives, thus this approach should be retained. Notable duplication is not apparent in the current objectives.				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	3	Paragraph		Table
Figure		Question	3.F	Other
2. Please set out your comments below				
<p>The New Local Plan should include a small number of over-arching thematic objectives, in particular the response to Climate Change would be an appropriate topic, building in some objectives that relate to the design and operation of new development outlined in the response to Question 3.D above.</p>				

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)	Other
2. Please set out your comments below				
<p>The new Local Plan should require development to adopt the most effective standards current at the time of the development proposal even if they are in excess of Building Regulations requirements. A continual drive towards ensuring the best available technologies are used is required if climate change concerns are to be addressed. By requiring the market to adopt those technologies the cost of addressing climate change will be properly reflected in the cost of development and hence consumer choices. The Borough would be in a position to make positive marketing statements about its stance on the issue.</p>				

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	Other
2. Please set out your comments below				
<p>For the reasons outlined in the response to Question 4.A a) the new Local Plan should require development to implement the highest possible water standards current at the time of the development proposal.</p>				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph	5.16 & 5.19	Table	5.3
Figure		Question		Other	
2. Please set out your comments below					
<p>Paragraph 5.16 states:-</p> <p>“Meanwhile development in the Key Service Villages and the Rest of Borough has ensured that the Council has a five year land supply. However, it is recognised that some of the Key Service Villages have received a disproportionate amount of housing than others (Table 5.3).”</p> <p>In relation to Weston, Table 5.3 shows that in the period April 2011 to March 2019 planning permission for 14 dwellings was granted, amounting to a 3 % growth in the settlement over the same period. (The Settlement Assessment of July 2018 also notes that in the 2011-2017 period planning permission was granted for 10 dwellings). The implication is that Weston has contributed a disproportionality small share of new housing in that period – with possible implications for future development allocations. However, confining the analysis to a specific period of time risks severely distorting the picture. Immediately prior to the period considered by Table 5.3 Weston accommodated very substantial new residential development at Salt Works Lane, which increased the number of dwellings in the village by almost 24% (with no increase in village facilities).</p> <p>Considerable caution is needed in using the data in Table 5.3 as a basis for considering where future growth in the Key Service Villages, or “Medium Village” of the Settlement Assessment should be allocated - an approach of villages not having seen much growth in the 2011-2019 period being required to accept considerably more growth in the period of the new Local Plan, which seems to be implied by the third bullet point of Paragraph 5.19 overlooks the amount of development that some villages have been required to absorb in the past and hence whether there is any capacity for future growth.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph	5.25	Table	5.4
Figure		Question	5.D	Other	
2. Please set out your comments below					
<p>The proposed Settlement Hierarchy set out in in Table 5.4 draws on the work of the Settlement Assessment and Profiles mentioned in Paragraph 5.25.</p> <p>The July 2018 Settlement Assessment for Weston states that the village has one Post Office and general store – this was incorrect in 2018 and remains incorrect in 2020. The Post Office service was withdrawn in 2010 and the remaining general stores element of the business closed in 2013. Subsequent attempts to establish a Community Shop were unsuccessful. There is no Post Office or shop in Weston. The nearest facilities are in Hixon (Post office and convenience store) or at Beaconside (new convenience store).</p> <p>It is of concern that decisions about the Settlement hierarchy and possible location of new development are to be made on the basis of information that was inaccurate when the Settlement Assessment was originally compiled and remains inaccurate today.</p> <p>In response to Question 5.D I do not, therefore, agree with the basis for the preparation of the 2019 Settlement Hierarchy.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5.E	Other	
2. Please set out your comments below					
<p>The “Tier 3” settlements should be included in the Settlement Hierarchy otherwise the new Local Plan risks not taking a comprehensive view of where development should be located in the Borough. There are clear differences between the Tier 3 urban areas and the Green Belt settlements listed in Table 5.5 that make it appropriate to include the Tier 3 settlements in the Settlement Hierarchy.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph	5.34	Table	5.7
Figure		Question	5.G	Other	
2. Please set out your comments below					
<p>Consideration of a new Garden Community/Major Urban Extension may be helpful in meeting future housing and employment land requirements.</p> <p>Of the possible locations outlined in the table in Paragraph 5.34. locations iv. Land to the north of Redhill Business Park and v. Meecebrook seem to offer the best alternatives, as:-</p> <ul style="list-style-type: none"> a) Both locations offer the potential for a sizeable new development that would have the scale and mass required for innovative design and provision of community facilities, as well as supporting the new infrastructure that would be required. b) Land north of Redhill is well situated to extend transport link into Stafford and is very well placed on existing road infrastructure to link to the M6 at Junction 14. Public transport and walking/cycling links into Stafford are achievable. The expansion of Stafford by such a development would contribute to re-vitalising the town centre. <p>In relation to locations vi. Hixon and vii. Land at Weston (referred to respectively as Sites E and F in the Stafford Borough Strategic Development Site Options report prepared by AECOM (“the Report” in the comments below)) I do not consider that either of these sites are suitable locations for a new Garden Community/Major Urban Extension, for the following reasons:-</p> <p><u>Scale</u></p> <p>Each of these sites, if developed to the extent considered by the Report, would constitute an extreme and character changing expansion of each settlement. This is particularly the case for Weston, where the scale of the potential development dwarfs the present settlement (where development has been held within tight boundaries) and potentially shifts the core of the village from its present location.</p> <p><u>Individual & Cumulative Effects</u></p> <p>Individually either of these Sites would have a substantial impact on the character of the settlements, landscape character, utilities, traffic, infrastructure and transport resources. The cumulative effect of <u>both</u> sites being developed would be severe. Were this to happen there would be minimal separation between the developed areas, essentially creating a large urbanised area, destroying the essentially separate character of Hixon, Weston and Stowe-by-Chartley.</p>					

Question 5.G continued

Cohesion – Site F:Weston

In relation to Site F: Weston, a large portion of the land shown as potentially developable in Chapter 4 of the Report site lies to the east of the A51 and this portion is split into two by the Colwich-Stone section of the West Coast Mainline railway line. The A51 is already a very heavily used road and would become more so with either or both of the Site E and Site F developments. The Report does not seem to have given any consideration to the safe inter-connection of the portions of the potential development site lying to the East of the A51 and the railway with the existing settlement. Without such connections the cohesion of the village would be very adversely affected, so that there is a risk of creating in effect a stand-alone community without access to present village resources, e.g. the primary school, the village hall and the public houses, and with the existing village having restricted access to any new community resources provided in the development.

Even within the potentially developable area the severance caused by the railway line risks creating two communities, this, and the very substantial cost of providing access across the railway, has not been recognised in the Report.

Road Access

The Report for both sites notes the need for upgraded and new connections to the A51.

In the case of Site E; Hixon such upgraded access is essential. The principal access to Site E will inevitably have to be via New Road, where the junction with the A51 is already a bottleneck at peak periods and where egress onto the A51 is risky at all times.

The Report (page 52) also suggests that new access roads to Site E: Hixon could be constructed from Stowe Lane and Bridge Lane, but with road upgrading needed. This is utterly absurd:- any access from Stowe Lane would merely draw additional traffic (both residential and industrial/employment use related) through either Hixon or Stowe-by-Chartley; any capacity improvements to Stowe Lane between Hixon and Stowe-by-Chartley would destroy the character of Stowe Lane outside the settlements and it is hard to see what capacity improvements could be undertaken in Stowe-by-Chartley village itself. Stowe Lane from the A518 to Hixon is already used by excessive amounts of traffic, including commercial vehicles accessing the employment areas at Hixon- steps are required to reduce this usage, not increase it.

Moreover the junctions of both Bridge Lane with the A518 at Amerton and Stowe Lane with the A518 at Chartley are both currently very poor in terms of traffic speed and sightlines (Bridge Lane particularly so) and it is hard to see how any realignment or other substantial improvement could be effected.

In the case of Site F: Weston, new development will increase traffic on the already busy A51, the severance of the existing settlement (and the portion of Site F to the West of the A51) from the land to the East of the A51 is a significant constraint.

Question 5.G continued

Employment

In the commentary on Site F in Chapter 4 of the Report it is stated:-

“The area where the site is located does appear to attract some main employers, with a cluster of industrial and manufacturing companies to the south of the site. Consequently, manufacturing is the most prominent broad industrial group for the area, including a good portion in high-tech manufacturing. Workers do not tend to live close to their place of work, and typically travel by car. Future employment development could benefit from the proximity to existing sectors and assets, helping to advance employment growth in these areas. The housing, as well as the housing allocations in the vicinity, could bring in the necessary workforce to support the future development and lessen commuting needs. This scale of proposed activity would likely be supported in the area.”

There is, however, no mechanism available in the planning system for ensuring that the workforce in any new employment allocation is drawn from any associated housing allocations, so that this linkage and the intention of reducing community needs is at best aspirational. The actual outcome would depend in large measure on the nature of the employment opportunities created (difficult to control through the planning system except by specifying e.g. high-tech workspace versus “sheds”) and the mix of housing provided.

Sewage Disposal

It is noted that the options summaries in Chapter 4 of the Report for both Site E:Hixon and Site F:- Weston have identical text regarding the capacity of Hixon WwTw to accept more development, noting that development above 5,000 homes would have to be transferred to Brancote WwTW. This comment seems peculiar in respect of Site F: Weston, as in 2016 a scheme was completed to connect the Weston WwTw to Brancote WwTw by means of a pipeline running, in part, below the A518. Has the Report and contact with Severn Trent correctly assessed the sewage disposal implications of the development of Site F: Weston?

New Railway Station Potential

The Report suggests that both Sites have the potential for a new railway station on the Colwich-Stone section of the West Coast mainline to improve public transport access, but no evidence is provided as to whether this is at all feasible or realistic.

There are at present no trains running on this line that provide any local service connections and no suggestion that this situation is likely to change in the future, even if and when HS2 frees up capacity on the line currently taken up with inter-city services. Without some positive assurance that such services would become available in the future this potential should be omitted from any consideration of whether these sites should be developed.

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	5	Paragraph	5.79 – 5.98	Table
Figure		Question		Other
2. Please set out your comments below				
<p>It is noted that the Strategic Housing and Employment Land Availability Assessment includes two potentially developable sites in Weston WES02 and WES 03.</p> <p>In relation to site WES02 this is said to have a potential yield of 251 dwellings (the site also forms part of the potential Site F urban extension of the Strategic Development Site Options report).</p> <p>As noted in the comments regarding Paragraphs 5.16 and 5.19 above, whilst Weston has seen relatively few permissions granted for new dwellings in the period since 2011, shortly before that period permissions were granted for the major Salt Works Lane housing development, a Brownfield site that has subsequently been developed. This development increased the size of the village by approaching 25%, without any increase in community resources. Site WES2 has a potential capacity for a number of dwellings larger than the Salt Works Lane development, materially altering the scale and character of Weston and as such requiring very careful consideration and consultation as to whether site WES2 should be included as a Greenfield development in the new Local Plan (with consequent redrawing of the Settlement Boundary).</p> <p>It is difficult to see how, within the boundaries of Site WES02 as drawn in the SHELAA, development could take place that would have good connectivity with the remainder of the village, an important consideration for community cohesion, particularly if the new development should be required to include a community resource such as a shop/Post Office. Road access would have to be provided from the A51 and any pedestrian access within the boundaries shown would seemingly be possible only via Salt Works Lane (this not being a suitable route for vehicular access to a development of this scale). This issue could be addressed if both Sites WES02 and WES03 were considered for development, but at the cost of increasing the scale of the proposal to the further detriment to the scale and character of the existing settlement.</p>				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	8	Paragraph	8.6 & 8.7	Table
Figure		Question	8.A	Other
2. Please set out your comments below				
<p>I very much support the policy approach advised by the NPPF and the thrust of the currently adopted Local Plan.</p> <p>The council should continue to encourage the development of brownfield land over greenfield land.</p>				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	8	Paragraph	8.B	Table
Figure		Question		Other
2. Please set out your comments below				
<p>I do not consider that the enforcement of minimum density thresholds would have a beneficial impact on development in the Borough. The risk associated with such thresholds is that in order to achieve the threshold, developments may have to be designed which are alien to the locality in which they sit and which are often poorly provided with parking, which despite aspirations to reduce car use will, realistically, be an issue for most of the new Plan period. Examples of inadequate provision are to be found in many recent developments.</p>				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	8	Paragraph	8.24 & 8.25	Table
Figure		Question	8.I	Other
2. Please set out your comments below				
<p>a) The Council should adopt a policy requiring bungalows to be delivered in all major developments, with the design of those bungalows taking account of the needs of the less able. Specifying a minimum number seems illogical and may frustrate otherwise desirable development, the number of bungalows needs to have regard to the overall size of a proposed development. An indicative proportion of bungalows seems to be a better policy, but perhaps more work is need to suggest what the proportion should be.</p> <p>b) Bungalows need to be made available and attractive to a range of potential occupants with differing aspirations and needs, a general policy of limiting garden sizes would be inappropriate from this standpoint, A policy requiring a range of provision would seem more appropriate.</p> <p>c) There is a definite need for bungalows to be delivered in both urban and rural areas – provision needs to be made for those wishing to downsize or move to housing more appropriate to their needs whilst remaining in their community, this is an important consideration for new rural housing provision.</p>				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	8	Paragraph	8.31	Table
Figure		Question	8.M	Other
2. Please set out your comments below				
<p>Existing Rural Exception Site Planning Permissions where development has not yet commenced should be converted to Rural Affordable Housing Site Allocations.</p>				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	9	Paragraph		Table
Figure		Question	9.A	Other
2. Please set out your comments below				
<p>a) The Council should have a separate policy to address Green & Blue Infrastructure. Such infrastructure is important in contributing to the Borough’s attractiveness as a place to live and work and should hence be considered as an integral part of any development. The notable canal and river network in the Borough makes it important that a focus is given to, inter alia, these elements.</p> <p>b) Specific opportunities to provide additional green infrastructure should be identified and included in the criteria for new developments.</p>				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	9	Paragraph		Table
Figure		Question	9.C	Other
2. Please set out your comments below				
<p>a) Whilst the new Local Plan should contain policies protecting designated sites from inappropriate development, the level of protection given must be graduated, commensurate with the relative importance of each site and the processes used to identify and then designate each class of site.</p> <p>b) The new Local Plan should encourage biodiversity enhancement of sites through development and there is much to be said for a preferential approach to allocating sites for development that can deliver biodiversity enhancement <u>provided</u> that there are strong mechanisms in place for ensuring that such enhancement is well designed, is actually executed and is properly managed and maintained thereafter.</p> <p>c) Policy in the new Local Plan to require increased long-term monitoring of biodiversity mitigation and enhancement measures on development sites is to be welcomed. A considerable amount of work is often done on proposed developments to consider the effects on biodiversity and propose mitigation measures, particularly where formal Environmental Statements are required as part of the development management process. This often represents a considerable investment in studies, but there has been limited follow up in terms of requiring monitoring and reporting of the effect of mitigation and enhancement measures thereafter in the level of detail of the initial studies. Such monitoring <u>and public</u> reporting of the detailed results is important in ensuring both that the required measures are effective and in providing a future widely accessible database on the effectiveness both of the predictive techniques employed in the pre-development studies and the success of the measures employed. Such monitoring must also feed into effective mechanisms for managing biodiversity mitigation and enhancement measures to ensure that they deliver the intended outcomes.</p>				

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

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

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

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

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

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

How we will use your details

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

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

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

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

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

MR R GRIME EMAIL RESPONSE – 20 APRIL 2020

From: Robin Grime [REDACTED]
 Sent: 20 April 2020 23:20
 To: List-ForwardPlanning-SBC
 Subject: "Issues and Options" Consultation - Response Form

**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	Robin	
Surname	Grime	
E-mail address	[REDACTED]	
Job title (if applicable)		
Organisation (if applicable)		
Address	[REDACTED]	
Postcode		
Telephone Number		

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	5D	Other	
2. Please set out your comments below					

Both medium and smaller settlements should be included especially where they have schools and other facilities.

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	5G	Other	
2. Please set out your comments below					
<p>One Garden settlement is desirable – Cold Meece</p> <p>Further development of brownfield sites is essential and should be taken whenever available. However I feel that the plan focusses too greatly on the key service villages.</p> <p>I feel that the middle and smaller villages should take a greater burden than previously required and consider the development of Great Bridgeford, Seighford, Derrington and Hyde Lea to the west and Weston and Acton Trussell to the east should be considered in a hub and spoke arrangement – with Stafford at the hub.</p> <p>In addition the only Garden development worth serious consideration is the Cold Meece option as it would include new transport links, schools, shops and other infrastructure.</p> <p>The sites identified between Haughton and Gnosall should be discounted as the A518 towards Stafford is already congested and 18,000 (three cars per household) journeys would likely overload the bottleneck at the M6 crossing. Schools in Gnosall and Haughton are already oversubscribed and public transport is not available.</p> <p>The proposals seem not to include shops – and there are but a few in either village.</p>					

Response to consultation on Issues and Options for Local Plan February 2020

by Robert Hine [REDACTED]

Reference <https://www.staffordbc.gov.uk/forward-planning-consultations>

Overview

The consultation document contains much that is commendable, but like its predecessor it continues to use the term 'sustainable' in an often vague and arbitrary way, without detailing how this translates into practice. Its main focus is on 'growth' and 'development', and yet at the same time acknowledges that the Council has declared a climate emergency. But it fails to reconcile this 'business-as-usual' scenario with the need to implement rapid and radical changes to virtually all aspects of society in order to achieve net zero carbon emissions in the lifetime of the new Local Plan, or sooner. Such changes must be integrated into all aspects of policy covered in this document, and not regarded simply as an 'add-on' to comply with the NPPF. This is where the document is crucially and centrally defective.

As gov.uk makes clear in its planning guidance pages: "The National Planning Policy Framework emphasises that responding to climate change is central to the economic, social and environmental dimensions of sustainable development."

Since this document was compiled the coronavirus pandemic has radically altered the economic outlook both in the short and long term. The document will need overhauling to reflect the likelihood of a long and deep economic recession. Any new Local Plan must focus on supporting a truly sustainable, resourceful and resilient local economy that serves the needs of local people, and can adapt quickly to changing social, economic and environmental factors.

Responses to selected questions

Question 3.A

Do you agree that the Vision should change?

The term 'sustainable' should be defined in any new version of the Vision. What do you mean when it is used in so many different contexts? This is important when it is such a significant element of policy. Emphasize that it means 'meeting the needs of the present without compromising the ability of future generations to meet their own needs' [NPPF p. #7], and stands on the three pillars of social, environmental and economic wellbeing – and that the environmental element is FAR wider than 'enhancing the surrounding environment' (8.4).

Question 3.B

Do you agree that the Vision should be shorter?

A: Yes

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?

A: Yes. The response to the climate emergency should be a core principle of the new Local Plan, with a target for carbon neutrality of 2030. In 2019 the Council declared a climate change emergency, and the new Plan should reflect that.

The draft Plan is heavily focused on economic growth, yet the Corporate Business Plan 2018-2021 does not even mention 'climate change' or 'carbon emissions'! The intimate link between the economy and the environment must be recognised by the new Plan, and the emphasis shift to one of genuine environmental sustainability instead of economic growth per se.

Question 3.D

Should the spatially-based approach to the objectives be retained?

Does this spatially-based approach lead to duplication?

A: No. These are too focused on specific types of 'development' to meet the changing and unknown needs of the next decade. A thematic approach is preferable.

Question 3.F

Should there be additional objectives to cover thematic issues?

If so what should these themes be?

The overarching key principles should be to create sustainable communities in Stafford Borough where

- the needs of everyone in the community are met and people feel safe, healthy and ultimately happy
- our environment is appreciated, protected and enhanced and damage to the environment is minimised
- our economy is vibrant, employment opportunities are improved and our working lives are more rewarding

(SBC website: <https://www.staffordbc.gov.uk/characteristics-of-a-sustainable-community>)

See also from the same page on the SBC website:

Protecting and Enhancing the Environment

- use energy, water and other natural resources efficiently and with care
- minimise waste, then re-use or recover it through recycling, composting or energy recovery, and finally sustainably dispose of what is left
- limit pollution to levels which do not damage natural systems
- value and protect the diversity of nature

Meeting Social Needs

- create and enhance places, spaces and buildings which work well, wear well and look good
- make settlement 'human' in scale and form
- value and protect diversity and local distinctiveness and strengthen local community and cultural identity
- protect human health and amenity through safe, clean and pleasant environments
- emphasise health service prevention action as well as cure
- ensure access to good food, water, housing and fuel at a reasonable cost
- meet local needs locally wherever possible
- maximise everyone's access to the skills and knowledge needed to play a full part in society
- empower all sections of the community to participate in decision-making and consider the social and community aspects of decisions

Promoting Economic Success

- create a vibrant local economy that gives access to satisfying and rewarding work without damage to the local, national or global environment
- value unpaid work
- encourage necessary access to facilities, services, goods and other people in ways which make less use of the car and minimise impacts on the environment
- make opportunities for culture, leisure and recreation readily available to all

Question 4.A

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

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

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

A: a) The new Plan should set standards aiming for the near-full decarbonisation of residential dwellings, with tighter energy efficiency standards, large scale uptake of low-carbon heating technologies and a local planning strategy for infrastructure decarbonisation. This is in line with the Future Homes Standard 2025. Homes built in the next 5 years should be future proofed to enable replacement of gas boilers with low-carbon heat pumps. Account should also be made of the embodied carbon of construction, as operational carbon emissions decline to net zero.

As regards non-residential buildings, Policy N2 of the currently adopted Plan states: "All non-residential development up to 1,000 square metres (net) will be expected to have a BREEAM Very Good rating; and non-residential development greater than 1,000 square metres (net) will be expected to have a BREEAM Excellent rating. A statement will be required to detail how the BREEAM and Zero Carbon Standard will be addressed. If these are considered to be unviable to achieve, evidence must be provided through an independent viability assessment."

These standards should be increased to Excellent and Outstanding, respectively.

b) There is little or no evidence that current standards are being adhered to. For example, Chris Stark, CEO of the Committee on Climate Change, has said: "New buildings have failed to deliver the performance claimed. The regulations have permitted these certificates to be based on the modelling of building designs, and the actual performance is different and has failed to deliver the claims. LA's have the responsibility to ensure standards, checking validation, and enforcement of those standards, yet do not have the sources nor staff so such work does not get done."

To ensure climate change mitigation measures are integrated within development across the borough the new Plan should establish a clear and adequately resourced system of monitoring the performance of new build throughout the Borough to ensure it complies with building standards.

Further, all new developments should be required to produce an assessment of both embodied and operational carbon. Embodied carbon is: "the total greenhouse gas (GHG) emissions (often simplified to "carbon") generated to produce a built asset. This includes emissions caused by extraction, manufacture/processing, transportation and assembly of every product and element in an asset. In some cases, (depending on the boundary of an assessment), it may also include the maintenance, replacement, deconstruction, disposal and end-of-life aspects of the materials and systems that make up the asset."

UK Green Building Council: Embodied Carbon: Developing a Client Brief (2017)

Question 4.B

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

A: Much more solar PV needs to be installed especially given the expected large-scale switch to electric vehicles. The Plan needs to facilitate large-scale installation of solar PV on commercial buildings for charging electric vehicles, e.g. by the Council joining forces with Big Solar Co-op (<https://bigsolar.coop/>).

EVs can themselves form part of local electricity storage systems incorporating battery farms as part of a smart grid. New housing should incorporate solar PV as standard wherever practicable.

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?

A: Yes, this is something that should have been incorporated in the current Plan, and is an essential component of any Local Plan if large-scale developments are to address climate change. At least 30% of energy should be sourced from on-site renewables, including solar PV, heat pumps and district heating systems.

Question 4.E

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

A: Yes, new developments should incorporate waste-water recycling and sustainable drainage systems (SUDS).

Q5A:

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

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

A: The planning system should support the transition to a low-carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low-carbon energy and associated infrastructure.

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?

A: Scenario D: Housing allocation should not exceed the 408 dwellings per annum as generated by the standard method, especially in light of the massive commitments for 6000 homes already made in the existing Plan. This scale of development is rapidly changing the character of Stafford, Stone and the villages, putting pressure on the capacity of existing infrastructure, and increasing the carbon footprint of the Borough massively. Growth rates predicted in scenarios E, F & G are highly speculative, especially in light of the severe global economic recession that is likely to follow the 2020 coronavirus pandemic. Moreover, they are inconsistent with efforts to achieve net zero carbon emissions for the Borough in the time frame 2020 to 2040.

Note also that the EHDNA report is seriously flawed because it makes no mention of 'climate change' and mentions 'carbon emissions' only once in passing. It uses the term

'sustainable' in various contexts and without definition, rendering it meaningless. As such little credibility can be attached to its findings.

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.

A: Yes, the discount should be applied for the full 6000 homes. The level of development in the current Plan is already too high, although the quota of affordable homes in that allocation should be increased to at least 40%.

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.

A: Adoption of the minimum housing allocation or thereabouts will obviate the need for such large-scale development as a 'garden community' or 'major urban expansion'. The notion of a 'garden community' is fanciful: such developments are in practice simply large out-of-town housing developments, which encourage car use due to lack of local facilities, public transport or access to local employment. Such developments have a deleterious environmental impact, inevitably leading to loss of valuable farmland and destruction of the countryside. To quote the CPRE: "the 'garden' soubriquet [is] applied to ever more random development proposals, which seem to lead to low-density, car-dependent, residential-led sprawl."

There is no hard evidence that such a scale of development is needed, let alone desired by anyone, especially given that the 5-year assessment of the Local Plan is an assessment of whether it 'effectively addresses the needs of the local community'.

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.

A: No. See answer to 5.G above.

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.

A: Growth Option scenario D, with partial catch-up, discount applied, and no 'garden community'. Development at any scale should be predicated on guidelines of environmental sustainability and the need to cut carbon emissions to net zero in the time frame of the Plan. All scenarios as presented are flawed in this respect, because they are based on some as yet undefined 'economic growth strategy'; instead they should be based on a robust climate change strategy. Moreover, there is no mention of financial incentives such as the New Homes Bonus, which the Council has received for exceeding its housing allocation under the current Plan. This has to a large extent driven the current disproportionately high housing commitments, and amounts to £2.65m in 2018-19, and £3.3m in 2019-20. There is no mention of this anywhere in the document I note!

Question 5.K

Do you consider the EDHNA [sic.; should be EHDNA] recommendations for an Employment Land requirement of between 68-181ha with a 30% (B1a/B1b) : 70% (B1c/B2/B8) split reasonable?

If not, what would you suggest and on what basis?

A: The EHDNA report is seriously flawed because it makes no mention of 'climate change' and mentions 'carbon emissions' only once in passing. It uses the term 'sustainable' in various contexts and without definition, rendering it meaningless. As such little credibility can be attached to its findings.

Question 6.F

a) Where do you consider small and medium size units should be made available?

b) Do you consider there are any other issues relating to building type and size which may be potentially restricting economic opportunity within the Borough?

Please explain the rationale for your answer.

A: Provision should be made for low-cost start-ups for shops and offices in or near town centres to encourage small local businesses, with help via business rate relief and business support networks. This is the only way to create a truly resilient and diverse local economy that serves local people and retains value locally.

New developments, such as the proposed 'Stafford Gateway', will sweep away fledgling local businesses in the area, such as at the former Jen Shoes factory, and replace them with

high-cost units that no local business can afford. It will also destroy the community sports facility Stafford Bowling Club, whose members have invested huge personal commitment in the creation of a sustainable solar powered (SBC Green Award winning) facility to the benefit of many, plus other grass roots sustainability enterprises such as Roots Larder. Instead a more holistic and nurturing approach is needed, where existing premises are repurposed and/or refurbished wherever practicable, and made available at low cost. A similar low-key and evolutionary approach can be applied in rural areas, with conversion of existing farm buildings, as has been done so successfully at Dunston Business Village.

The carbon footprint of such a development approach is much lower than demolition and new build, which seems to be the only strategy the Council can conceive.

Question 6.I

To assist the rural economy should the Council:

- a) Seek to allow for the expansion of rural business premises where this might be otherwise restricted by the relevant planning policies? Should there be any restrictions or conditions to such expansion?
- b) Propose a policy stipulating the installation of super-fast broadband to all new business development in the rural areas of the Borough?

A: Expansion of rural business premises is often essential to ensure that such communities remain viable places to live and work, and are not just picturesque dormitories for those who work in nearby towns and cities. We must accommodate rural crafts and industries wherever possible without undue detriment to the countryside. Fast broadband is essential for any modern business.

Question 7.B

- a) Do you consider that the future approach to the centre of Stafford, Stone and Eccleshall should be based on their respective distinctive characteristics?

A: Over recent decades, planners have contrived to destroy much of the charm and distinctive character of Stafford, and to a lesser extent Stone, by their enthusiasm for large-scale redevelopments, such as the Riverside shopping area in Stafford. This has moved the town's focus away from its natural centre, Market Square, and left the north end of the town semi-derelict.

Long-term planning for town centres in this fast-changing world is uncertain at best, and requires a complete break from past practices. Any approach must be flexible, nimble and able to accommodate rapidly new trends and fashions in behaviour and tastes. Traditional approaches to property development are totally unsuited to this new era. Instead the focus should be on incremental change with reuse and repurposing of existing buildings, encouraging local talent and entrepreneurs by offering a mix of business, retail, leisure and residential, and integrating cutting-edge sustainability design features.

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?

A: a) There is no need for yet another policy, which risks a more fragmented approach. The natural environment and green infrastructure should be considered holistically.

b) It is vital for biodiversity that every opportunity is taken to provide wildlife corridors between existing green areas. This connectivity is required to ensure that populations do not become isolated and decline to the point of becoming locally extinct. Consider working with groups such as Buglife on their B-Lines project (<https://www.buglife.org.uk/our-work/b-lines/>). There is also the grass verges project with PlantLife (<https://plantlife.love-wildflowers.org.uk/roadvergecampaign/your-questions-answered>).

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

A: a) Yes.

b) Greenfield developments, as allocated for new housing under the current Plan, have inevitably resulted in a net loss of biodiversity. Mature hedgerows are grubbed out, trees felled, and habitats are lost. There has been scant regard for this by developers. New developments should be required to enhance biodiversity, with high expectations/specific targets set for biodiversity gains, not merely ‘encouraged’ to do so.

c) Monitoring biodiversity, both during and post-development, is laudable, but will require the people and resources to do it.

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?

A: These aims are laudable, but a Tree Strategy will require much greater resources to realise in practice. There is currently a single Tree Officer, who is overwhelmed with work. Any Tree Strategy requires careful planning to determine such factors as species composition, structure, location, monitoring and management for the life of the plantation. Moreover, mature trees should be protected from developers as a given. Also targets /figures need to be ambitious and NOT dependent on development/housing and employment land expansion. Current Council resources are woefully inadequate to meet these ambitions.

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.

A: a–d) Yes to all these. Growing your own food has immense social, psychological, economic, and often environmental benefits, which are well recognised. But appropriate support for communities to instigate behaviour change and encourage such activities is an essential part of this strategy.

Question 9M

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

A: In principle, such designation is useful, provided such areas are sympathetically managed, and not simply mown and sprayed so their value to wildlife becomes minimal.

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?

A: a–c) Yes to all these.

d) Traffic pollution near schools and nurseries is a particular concern. Cannot by-laws be introduced to prevent vehicles from idling with engines running when parked near such premises?

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?

A: Yes.

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?

A: a, b) Yes!

c) Support community recycling schemes, such as TerraCycle (<https://www.terracycle.com/en-GB/>), which deal with hard-to-recycle waste.

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

A: Any transport strategy needs to consult with user groups as well as the bodies mentioned, e.g. civic societies and amenity groups, U3A, Sustainability Matters, cyclists, Ramblers.

Question 12.B

- a) Do you agree with the approach to widening the choice of transport solutions through large scale development in key locations across Stafford Borough, related to the existing network? If not please provide a reason for your response.
- b) How do you consider that high quality walking and cycling networks can be developed through new development?

A: a) Large-scale developments generally increase use of cars and service vehicles, and are seldom tightly integrated with public transport infrastructure, even where such exists. For instance, a new 'garden village' in a rural location will rely almost entirely on road connections and contribute to increased carbon emissions.

b) Where development can provide an opportunity to create new walking and cycling routes, these need to link to an upgraded network in town centres otherwise they are not well used. For example, there is no dedicated cycle lane serving Stafford Rail station, nor will there be a dedicated cycle lane over the West Coast Main Line bridge with the Western Access Road. These issues need to be resolved as well.

MS M BOOTH EMAIL RESPONSE – 20 APRIL 2020

From: Mary Booth [REDACTED]
Sent: 20 April 2020 21:52
To: forwardplanningconsultations
Subject: Response to Draft Local Plan Issues and Options

Forward Planning Dept
Stafford Borough Council
Civic Offices
Riverside
STAFFORD
By email

Dear Sir/Madam,

**THE DRAFT PLAN FOR STAFFORD BOROUGH 2020 - 2040: Issues and Options CONSULTATION
February 2020**

Having read the above document on your website, I have the following comments to make on it, for the Council's consideration. I have no objection to this response being made public. Please do not publish my email address.

5 b Windfall development sites should be allowed for when assessing housing numbers required in the Plan. A large number of these have come up and are coming up around the Borough, including in villages.

5.34 i and ii I object strongly to the proposals for Garden Settlements in these two areas around Gnosall. These greenfield sites would not be suitable and their inclusion appears to be solely based on the fact that the land has been put forward speculatively by landowners, including some county farm land.

Meecebrook is the only site in the list which merits detailed consideration. It is a brownfield site of previously developed land, but there would be problems regarding the lack of infrastructure and other issues. Also there is some likelihood of radioactive contamination on part of the site (recent press reports).

5.59 I do not support the idea of a corridor/cluster along the A518 between Gnosall and Haughton. This greenfield area should not be developed. A 'string settlement' along here would be a throw-back to the ribbon developments which ruined much of the countryside in the twentieth century. Each community should maintain its distinctive local character and separate identity.

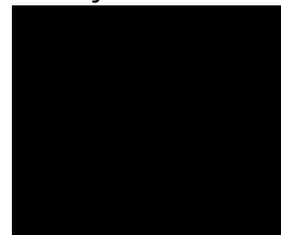
In general there should be far more development on brownfield land in Stafford Borough. A proper assessment of the availability of such previously developed land should be made and mapped out, so that potential developers could see the possibilities.

I would appreciate an acknowledgment of these comments.

Yours sincerely,

Mary B L Booth

Wojtek Kawecki



Comments on

Stafford Borough Council Local Plan 2020-2040

Introduction

As a resident of Hixon, I am particularly interested in the Local Plan in two respects: (1) plans for development in Hixon and (2) transport and communications infrastructure across the Borough. The first is a natural interest in what is happening in my back yard and how it affects me, and the second concerns my ability and options to travel beyond my back yard.

Hixon Development

Housing

The proposed plans for Hixon fill me with horror. Hixon is already an unusually large village. If all housing development in the plan takes place, Hixon will become four times larger. This is not evolutionary development, it is a revolution, and a very unwelcome one.

Much of the proposed new housing in Hixon would be the Garden Village at the airfield site. As an extension of Hixon, a village with one pub, one primary school and no doctor's surgery, that would be a disaster. The only way to make that work is to make the garden village independent (stand-alone) with its own facilities (that would need to be provided ahead of the housing) and with a buffer zone separating it from Hixon itself. To achieve the latter the garden village would need to be smaller, not extending as far to the east as Stowe Lane, and it would need a separate access road from the A51 crossing the railway. In fact the only advantage of the garden village that I see would be that it would make stronger the case for a main line railway station in the Hixon area (something that I would really like to see happen). However this might be a somewhat tenuous advantage considering the unnecessary obstacles that always seem to accompany attempts at opening or reopening railway stations.

In the light of the garden village the other proposed new housing for Hixon may appear moderate until it is realized that by itself it will still swell the village by about 50%. On top of growth in recent years this too is a substantial increase. And again, we must remember that Hixon is already a large village. The growth of Hixon should be restrained.

Hixon Employment Development

I am totally opposed to any further employment land in Hixon. The industrial estates are already intrusive and should not be enlarged. Moreover, judging by the traffic jams at the end of the working day at junctions of Church Lane and New Road with the A51, most of the employees are not from Hixon. In other words, the environmental impact is detrimental to the residents of Hixon and surroundings, not to those who create it.

Nearly all the existing employment land and all of the proposed additional employment land is to the east of the railway line putting great pressure on the approach roads to Hixon and through Hixon (despite the signposted restrictions). Dedicated roads from the A51 to the existing industrial estates are needed to isolate the industry from the village.

Transport and communications infrastructure

Overview

For transport and communications infrastructure the Local Plan is full of the correct terms giving a vision of a bright and happy future: sustainable transport, public transport, enhancement of walking and cycling paths etc. What it almost ignores is rail transport which does not really get mentioned till page 143 (except for connectivity of Stafford by rail to major cities and a probably false hope of a HS2 station in Stafford mentioned on page 21). Also, as is often the case, the term sustainable public transport is here simply a euphemism for buses, a transparent feeble attempt to make buses more attractive.

Buses

Buses do have an important role to play, but they are the lowest form of public transport. They are not attractive and often a last resort. One reason for this is that they use the same roads as cars so they get stuck in the same traffic jams. Also they have to take tortuous routes to try to serve more people. On top of that they have timetables that often seem inconvenient. Bus is short for omnibus, the Latin word meaning for everybody, but you can't please all of the people all of the time.

For example I regularly go from Hixon to Stafford on Sundays to attend church and I make use of the trip to also do my weekly grocery shopping in Stafford. However there is no Sunday bus service so I use my car. The Hixon to Stafford bus also does not run on other days in the early morning and after 6 pm. At those times the nearest bus to Hixon is the Stafford-Lichfield service at Great Haywood, 3 km from my home (again excluding Sundays). Finally there is no longer a direct Hixon-Great Haywood bus service which is very inconvenient because the doctor's surgery serving Hixon is in Great Haywood.

The bus service via Hixon is not designed to connect with the (hourly) train services at the route's end in Uttoxeter, and it does not even serve the railway stations in Stafford and Uttoxeter. With planning, bus-rail journeys via Stafford can be reasonable (because of frequent trains at Stafford), but there is still a long hike across Stafford. As for the railway stations in Rugeley – forget it. For trains from Rugeley I use my car. On one occasion I left my car at Rugeley Trent Valley but returned late in the evening by a fast train to Stafford station. I then caught the Stafford-Lichfield bus which took me on a long rough tour round Baswich, the Haywoods and Springfield estate in Rugeley, to deliver me finally at Rugeley bus station from where there was still a 1 km walk to Rugeley Trent Valley.

I do have a senior bus pass which I try to use as much as possible, but often my car or taxi is a more convenient or only possible option.

Walking and Cycling

For local journeys and recreation, footpaths and walking routes around Hixon seem to be quite well developed and marked, and enjoyable. Hopefully this will continue. However the enhancement or creation of cycling paths would be very welcome. Hixon particularly needs a cycling path along the busy and dangerous stretch of the A51 from Farley Corner to Great Haywood. This would open up an enormous area of quieter roads easily accessible by cycling from Hixon, and make cycling to the doctor practical for me. Opening up and upgrading the (private?) track from Farley Corner to Ingestre Cross via Hoo Mill to cycling would make cycling from Hixon as far as Stafford more feasible. Allowing cycling along the public footpath from the end of New Road in Hixon to Ingestre would fill another significant gap in the cycling possibilities in the area.

Church Lane in Hixon is currently not very safe for cycling, though much better than the A51 beyond it. It is used to access the industrial estates. It also does not have a speed limit (other than the national limit). Consequently a lot of cars race along it at 60 mph or faster. To such drivers cyclists must be a nuisance, though not nearly as much a nuisance as the drivers are to cyclists. Some sort of solution is needed. Providing direct access to the industrial estates from the A51 would be a good solution.

Railways

Trains are much more popular than buses, even for local journeys. People are not prepared to give up their cars for public cars that have limited availability (i.e., buses), but trains are perceived as something different, something that complements cars rather than competes with them. In fact rail usage in the UK is now higher than ever in history. However the Local Plan does not really address railways except for longer distance travel. This is a mistake. Stafford Borough Council should take all opportunities to press for development of the railways locally.

It is scandalous that Norton Bridge railway station was closed by stealth a few years ago. It was closed temporarily in 2004 for development of the railway junction, but the station was not considered seriously in the development plans. The developed junction made it possible to have only three trains a day calling at Norton Bridge, and at off-peak times only. So low usage was predicted (correctly in the circumstances) and it was decided to close the station. The junction development plans should have included the ability of the station at Norton Bridge to accommodate a sensible more frequent service. With a good train service the station would have been very useful not just for the small community in Norton Bridge but also for the much greater population in Eccleshall and other nearby villages. It would also alleviate pressure (and parking pressure) at the railway stations in Stafford and Stone. However either through incompetence or by deliberate design a situation was allowed to arise that would lead to the station's closure.

A railway station that I use frequently is Rugeley Trent Valley. That used to have a very limited train service, at one point only 4 local trains a day each way. Station usage was probably not more than a dozen passengers a week. With the introduction to Rugeley of hourly services between Crewe and London in 2008, departing from 06:00 to 22:30, station usage has shot up to about a dozen passengers per train. This demonstrates the potential of railway stations in the Borough if a useful train service is provided. It also highlights the scandalous treatment of Norton Bridge.

Considering the current popularity of railways, Stafford Borough Council should push to reopen railway stations in the Borough. I have already stated that a mainline station at Hixon would be useful, especially if the garden village goes ahead. This could also serve as an 'East Stafford Parkway' for fast trains from London to Manchester. However we should not stop at that. Other stations along the Trent Valley line should be reopened for local trips or to feed into longer journeys (Colwich, Great Haywood, Weston, Sandon and the east platforms at Stone). Rail connectivity of Stafford to the south-west and north-east is poor, requiring roundabout routes. Every now and then there are calls to reopen the Stafford to Wellington line as a key missing link. Stafford Borough Council should come on board of that enthusiastically, with stations at Haughton and Gnosall. I even think that there should be to call to reopen the Stafford to Uttoxeter line (provision for a possible reopening should be made where HS2 crosses the former trackbed, like the aqueduct across the M6 Toll Road anticipates a hopeful reopening of a canal). That would provide a convenient link to Stafford for the Hixon garden village. And of course the Norton Bridge closure should be reversed with a useful station. None of these reopenings would be easy or cheap. But that does not mean they should be dismissed, just the opposite. The situation is changing and a commitment from Stafford Borough Council, even if initially just in principle, would demonstrate a bold and progressive attitude.

* * *

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

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

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

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

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

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

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

Please note:

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

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

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name Jane Bonser		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	9	Other	Page 122
2. Please set out your comments below					
<p>Protecting and Enhancing tree cover page 122</p> <p>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? No</p> <p>Are there any further measures which you think should be adopted to further enhance these efforts? Yes</p> <p>Para 9.25 states The Council is considering a multi-faceted approach to aid in the realisation of this objective by:</p> <p>a) ensuring that the existing tree stock within the Borough will be offered adequate protection from removal or damage.</p> <p>The use of the word ‘adequate’ is vague and needs further clarification with respect to the level of protection that will actually be afforded to trees. Furthermore there is no mention of policy regarding veteran and ancient trees, with the former having been brought into line with ancient trees in terms of level protection afforded to them under the revised NPPF para 175c in 2018. This states:</p> <p>‘Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists’</p> <p>It appears to have been previously accepted that if developers want a tree removed to further their developments e.g. Changers Way Stone, there is little to be done to protect the removal of the tree, especially if there is no TPO in place. Mitigation measures of planting more trees than those being removed always seems to be accepted despite the maturity of the tree/trees to be lost. And even if TPO’s exist this still does not necessarily mean a tree can be saved. The quote below was taken from The Planner dated 01/08/2019:</p> <p>‘The Woodland Trust notes that it campaigned for these changes, (NPPF changes 2018), for nearly 20 years and has worked to support local planning authorities to implement it, but argues that some authorities are still either unaware of the new wording and supporting guidance. Or, the charity continued, they are “unwilling to suitably enforce it”’.</p>					

Guidance from the Woodland Trust further states:

'As ancient woodland and ancient or veteran trees are irreplaceable, discussions over possible compensation should not form part of the assessment to determine whether the exceptional benefits of the development proposal outweigh the loss'.

There also needs to be recognition by the council of the edge effects of building too close to ancient woodland and ancient/veteran trees. These edge effects include;

Increase in hard surfaces and associated run-off • Change to local hydrology • Increased recreational pressure • New informal access points • Predation and disturbance from domestic pets • Gardens extended into woodland • Introduction or spread of non-native garden species • Fly-tipping.

Gov.UK guidance last updated on 5th Nov 2018 re Ancient Woodland, ancient trees and veteran trees states:

For ancient woodlands, there should be a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, it is likely a larger buffer zone will be required.

A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter.

Where possible, a buffer zone should contribute to wider ecological networks and be part of the green infrastructure of the area. It should consist of semi natural habitats and be planted with local and appropriate native species. The inclusion of gardens in buffer zones should be avoided and sustainable drainage schemes should also be avoided unless they respect root protection areas and any change to the water table does not adversely affect the ancient woodland or ancient and veteran trees.

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	9	Other	Page 123

2. Please set out your comments below

Landscape Character Page 123

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?

Yes

Question 9 H

Do you consider there are areas within the borough that should have the designation of Special Landscape Area? Yes

It is my understanding that Special Landscape Areas are a non-statutory designation applied by the local planning authority to define areas of high landscape importance within their administrative boundary. Areas of high landscape importance may be designated for their intrinsic physical, environmental, visual, cultural and historical value (my emphasis), in the contemporary landscape. Landscapes designated as a SLA may be unique, exceptional or distinctive to the local authority area.

I propose the Moddershall Valley Conservation Area, (MVCA), should have the designation of SLA for the following reasons:

The nature of the landscape is the casual factor in the siting of the flint and bone mills in the 18th century. It is evident that the ‘unique cultural landscape of industrial buildings are set for the most part in a green landscape. Therefore its attributes include what can be described as a ‘relict’ industrial landscape, where 18th century and early 19th century industrial development may still be seen in an 18th/19th century rural landscape.

Although there has been a recent re-appraisal of the Conservation Area, the original Conservation Area designation document of 1979 retains its relevance referring to it being:

‘an area of unique and outstanding archaeological interest and importance’

“ the mills are concealed within woodland and it is the scenery that first impresses” and it refers to the valley being ...” the most attractive and even dramatic scenery of mid Staffordshire.

The mills, the landscape and setting are inextricably linked. Significance derives not only from the heritage assets physical appearance but also from its setting and therefore its importance in this case is unquestionable and thus deems consideration for SLA status.

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	9.1	Other	Page 126

2. Please set out your comments below

Historic Environment page 126

Question 9.1 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? Yes

Heritage Assets in themselves are very important, however they should not be viewed in isolation. The landscape, in terms of topography and historical context in which they are sited is equally important. The local character of the area in respect of building style, which should also encompass non- designated Heritage Assets, also contributes to the Historic Environment. The ability to experience Heritage Assets, without inappropriate development close by with its associated noise and paraphernalia is also essential to the understanding of the Historic Environment.

2. Take a broader and more inclusive approach by explicitly encouraging the recognition of currently undesignated heritage assets, settlement morphology, landscape and sight lines? Yes

I use the Moddershall Valley Conservation Area as an example. Watermills are not just the functioning aspect of the building itself, but also consist of mill leats, mill pools, sluices, weirs, and dams. All are essential to the overall function of a mill and yet are not recognised because they are currently undesignated heritage assets. However Historic England are now accepting applications for the listing of these individual aspects of the function of a mill, (an example being Acorn Bank Mill, Temple Sowerby, Penrith – Mill News October 2018 The Magazine of the Mills Section of the Society for the Protection of Ancient Buildings), in order that they too can be preserved for future generations to understand and enjoy.

Settlement morphology is also important as recognised in the Moddershall Valley whereby it is accepted the siting of the isolated mills, (isolated being defined in the context of ‘set apart’), along with their associated mill workers’ buildings are distributed along its length in order to optimise the fall of water in order to drive the mill wheels.

3. Require planning applications relating to historic places to consider the historic context in respect of proposals for, for example, tall buildings and upward extensions, transport junctions and town centre regeneration? Yes

Specific historic places and landscapes should not be viewed in isolation when development is being proposed, but taken as a whole. For example, urbanisation resulting from development in one part of the Moddershall Valley, a small 3km in length Conservation Area, would result in the loss of its historical

integrity as a whole, and this would undermine its special interest and lessen its significance as a heritage asset.

Noise is another factor that should be taken into consideration. Take for example a proposal for the development of a theme park next to open parkland associated with a listed historic building. Whilst sightlines may not be compromised by the proposal, the impact of noise intrusion to the historic building and its parkland would be considerable.

4. Encourage the maximisation of the wider benefit of historic assets by their incorporation into development schemes through imaginative design? Yes

But only if appropriate to the original heritage asset.

5. Consider historic places and assets in the context of climate change permitting appropriate adaptation and mitigation measures? Yes

In order that our historic environment can be preserved for future generations to enjoy, adaptation and mitigation measures may have to be made.

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	Miss	
First Name	Julie	
Surname	Jackson	
E-mail address	[REDACTED]	
Job title (if applicable)	N/A	
Organisation (if applicable)	N/A	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number		

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 21 April 2020.**

Please note:

- Comments must be received by 12noon on Tuesday 21 April 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
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Stafford Borough Local Plan 2020–2040: Issues and Options Consultation Document. February 2020

Section 5 The Development Strategy

Question 5.B. (pp. 39-42, 5.4-5.9)

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?

Between 540 and 597 dwellings per annum should be the delivery target. As the Office of National Statistics figures for the birth rate and total fertility rates since 2008 and population projections for 15-34 year-olds between 2020 and 2043 in the Stafford local authority area, are quite stable with declines followed by equivalent rises, it seems doubtful whether the full PCU allowance would be required.

Question 5.C (pp. 42-44, 5.10-5.13)

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

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

Please explain your reasoning.

The planned 6,000 homes should be discounted from the housing provision stipulated in the future *New Local Plan*, due to the:

- 11-year overlap with the *Current Local Plan 2011-2031*, which has already exceeded the housing target for 2011-2031;
- uncertainties in economic situation in light of the global recession, the effects of Brexit and future trade/customs treaties, and the fallout from COVID-19 pandemic.

In terms of housing provision, these responses are based on the following statements from ***Lichfields. Stafford Borough Council Economic and Housing Development Needs Assessment. January 2020.***

- It is considered unlikely that the level of the planned future strategic economic growth could be sustained given the current economic climate, which negates the need to consider a higher housing figure to accommodate an economically active workforce.
- There are no significant exceptional circumstances to justify departing from the ***National Planning Policy Framework*** and ***Planning Practice Guidance*** standard methodology approach to calculating the minimum dwellings per annum (dpa) – which generates 408 dpa – taking into account the average 10-year projected household growth, historic under-supply, and affordability of the area.
- Stafford Borough Council has delivered a greater number of homes in the last four years than that required by the *Current Local Plan* – which has resulted in an overall delivery of 4,633 homes against a target of 4,000. Moreover, in four of the last eight years net housing delivery exceeded the minimum local housing need assessment by between

40% and 100%. In addition, the February 2019 Housing Delivery Test revealed that a greater number of homes than identified by the household projections had been delivered – which was shown to be approx. 1,418 homes over the projected requirement.

- In fact, the **Stafford Borough Local Plan Part 2 (2011-2031)** stated that by 31st March 2015, the number of houses required had already exceeded the target for the period of Plan by over 10% (1200 houses), while the target for the Key Service Villages as a whole had been 1330 houses (12% of total housing provision).
- Taking the population size and number of households in the current neighbourhood area as a starting point, housing need could be apportioned on a "fair share" basis. Therefore, the allocation would be:
 - 1 dpa to Stowe-by-Chartley parish
 - 6 dpa to Hixon
 - 3-5 dpa to Weston*

On this basis, a total of 10-12 dpa in the area of the interdependent proposed development sites *HIX07, HIX08, WES01* OR 200-240 dpa between 2020-2040 would be allocated. However, the *New Local Plan* proposes 2140 for the hamlet of Stowe-by-Chartley and village of Hixon at *HIX07* and *HIX08*, plus 310 for Weston OR a total of 2450 between 2020-2040.

*NB: There is a discrepancy between *EHDNA* Tables 12.1 and 12.2 in dpa for Weston: 3 and 5, respectively.

With regard to employment opportunities, the view that RIEs play an important role in providing rural jobs in close proximity to local residents is regularly expressed, but this is simply an assumption, as the Hixon survey for the **Hixon Neighbourhood Plan (2011-2031)** revealed that in reality the opposite is true:

- Over 700 residents leave their homes to go to places of work or education each day, 85% of which travelled out of Hixon. However, over 1,000 people come from outside Hixon to work in the village each day, which was confirmed by a survey of local businesses that reported 92.4% of their employees travelled into Hixon, with over 90% using their own car/van or car-sharing.
- Of the 15% who travelled to places of work or education within Hixon, only 7% were employees – 8% were schoolchildren attending the school. This was verified from the survey of local businesses that reported only 7.6% of their employees lived in Hixon.

Thus, the logical conclusion is that Hixon employment opportunities do not meet either the need or aspirations of local people, either longstanding or recent residents, despite the provision of affordable housing. The reason could well be due to such factors as when considering to move closer to their workplace, people have to take account of the location of their spouses' workplaces and children's schools. In addition, as affordable housing is supposed to be for those with connections to the neighbourhood, it appears such people do not work in Hixon.

Moreover, the results shown in "Appendix 5: New Homes Survey Analysis" of the *EHDNA* indicate that "Proximity to work" and "Transport links" were not key drivers for house choice, whereas "Finding a suitable home" was.

The following statements in the *EHDNA* are also of relevance:

- A sharp decline in jobs was experienced between 1998 and 2008, with a net loss of 7,356 jobs, mainly due to the onset of the recession and restructuring of the borough's manufacturing sector. The manufacturing sector lost 7,655 workers over this 10-year

period, a fall of 52.3%, and despite stabilising between 2008 and 2018 and being able to slightly increase jobs by 541 jobs, the decline is projected to continue in the longer term (i.e. 2020-2040), with a further loss of 842 jobs, a fall of 11.2%.

- Future job growth prospects are moderate, the CE Baseline scenario representing a lower level of job growth than the Past Trends scenario, which assumes that the 0.83% Compound Annual Growth Rate (CAGR) for jobs experienced between 2000 and 2018 will continue between 2020 and 2040. However, this job growth rate is considered unlikely and unsustainable given the current period of considerable economic uncertainty, only partially as a result of Brexit.
- Job growth will not automatically result in the need to immediately increase floor space or the land required, due in part to the current spare capacity across many firms that laid off staff in the immediate aftermath of the recession. As these firms continued to operate from the same premises, a return to past staffing levels can be accommodated without physically expanding their operations.
- Future development rates for industrial space may be lower than previously as the sector rationalises and/or uses the space more efficiently. The continued restructuring of the manufacturing sector will also offer the potential for "recycling" older sites.
- The projection of strong growth in some sectors is unfortunately negated by the continuing decline in others. Furthermore, the evidence of a reversal in the decline of manufacturing is based more on the hopes of the local authority than on quantitative evidence.
- Considering the economic and employment opportunities expected to result from HS2 and the strategy for Stafford Gateway, it is feasible that the government could give less weight to any bid for Garden Community funding compared to other areas of the country requiring regeneration where no such advantages or opportunities exist.

It is worth pointing out that considering the borough's extensive countryside, agriculture/farming should be encouraged and supported, as well as wildlife, craft, and historical attractions, perhaps for visitors. It is surprising that considerable effort is taken to establishing new sectors in the area when there are current employment sectors, which are neglected despite existing demand, that require more encouragement and support.

Question 5.J (pp. 65-76, 5.64-5.66)

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.

Growth Option Scenario G + PCU + Discount + Spatial Option 3 (No Garden Community)

OR

Growth Option Scenario G + PCU + Discount + Spatial Option 5 (Garden Community)

The *EHDNA* states that it is likely the actual performance of Stafford's economy and commercial property market will fall somewhere between the CE Baseline and Past Trends scenario projections (i.e. *Scenarios D & F*). In light of the fact that Garden Community funding is not assured, HS2 is expected to exert a positive impact, and housing provision has exceeded the required target in the past and may continue to do so, it is pointed out that the CE Baseline + 50% scenario (i.e. *Scenario G Jobs Growth-Jobs Boost*) projection provides for a 50% uplift to the net job growth rate. Thus, the target for delivering housing would be 540-597 dpa.

In addition, it is worth noting that selecting *Spatial Option 3: Disperse development across the new Settlement Hierarchy* and *Spatial Option 5: Disperse development across the new Settlement Hierarchy and also at new Garden Community/major urban extension*, requires comment. Extensive and high-density development impacts significantly on agricultural/farming land, wildlife habitats, heritage sites, and current residential communities, while a lack of housing and employment opportunities in other under-developed areas lead to "ghost" areas, as locals must have to move in search of homes as well as work. Further, it will lead to increases in traffic volumes, potential for congestion, and risk of collisions and to road safety.



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

<u>Part A: Your Details</u> (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	Miss	
First Name	Julie	
Surname	Jackson	
E-mail address	[REDACTED]	
Job title (if applicable)	N/A	
Organisation (if applicable)	N/A	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 21 April 2020.**

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- 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.

Stafford Borough Local Plan 2020–2040: Issues and Options Consultation Document. February 2020

Section 5 The Development Strategy; Section 8 Delivering Housing

The "2011 Rural–Urban Classification" would categorize Stowe-by-Chartley itself as a rural hamlet, while the parish of Stowe-by-Chartley would be described as consisting of rural hamlets and isolated dwellings. As such no part of Stowe-by-Chartley parish falls within the Settlement Hierarchy.

In the past, development within rural sub-areas has remained within the constraints of ensuring that the distinct characteristics of villages and hamlets were not eroded. However, with the proposed Garden Community (Option vi. Hixon [HIX07, HIX08] and Option vii. Weston [WES01]), such distinctive features will be obliterated and the two communities of Hixon and Stowe-by-Chartley will be connected to form a small town, creating an urban sprawl. The suggestion for this area will not be a new, independent Garden Community; there will be no significant buffer between the village and hamlet. In fact, **Lichfields. Stafford Borough Council Economic and Housing Development Needs Assessment. January 2020** highlights that the majority of future land identified in the **New Local Plan: Settlement Assessment (July 2018)** is within the rural sub-market.

I would suggest that this proposed development is not acceptable because it is not in accordance with following criteria in **Spatial Principle 7 (SP7) – Supporting the Location of New Development** for defining Settlement Boundaries:

b) is of an appropriate scale to the existing settlement;

This new development will overwhelm the current residential community of the hamlet of Stowe-by-Chartley and triple the number of houses currently available in Hixon.

c) is accessible and well related to existing facilities

The current health and education amenities are extremely oversubscribed and there are no plans, or even guarantees, of their extension.

l) will not adversely affect the residential amenity of the locality.

This currently desirable location, due to its tranquillity, with limited noise and light pollution; and open countryside, with the associated wildlife, in which rambling and walks are enjoyed, supporting health and wellbeing, will be irreversibly undermined.

In fact, I suggest that it is even not in accordance with following criteria for supporting development outside designated settlements and in the countryside, because that support can be justified **only if**:

ii. It is consistent with the objectives of Spatial Principles SP6, Policies E2 and C5 in supporting rural sustainability;

However, it is not consistent with criteria 2 and 3 of in **Policy C5 Residential Proposals outside the Settlement Hierarchy – A. New Development: need to meet not only SP7 criteria but also all C5(A)**:

2. A Parish based Local Housing Needs Assessment, and an appraisal of the scheme, shall accompany any planning application, proving that it will meet the defined needs;

Neither **Stowe-by-Chartley Parish Housing Needs Assessment (HNA). 2019** nor **Hixon Neighbourhood Plan (2011-2031)** demonstrate such a need. In fact, following a 2018/2019 application for a Rural Exception Site for in the hamlet of Stowe-by-Chartley, for which one of the criteria was justification through a parish-based Local Housing Needs Assessment, **Stowe HNA** proved there was no such need and permission was refused.

3. The development is of a high quality design that reflects the setting, form and character of the locality and the surrounding landscape;

Modern buildings, and in such numbers and of standardised designs, would be out of character with the older, individual styles of residences in the hamlet of Stowe-by-Chartley;

neither would such a large development be in keeping with either the size of the village of Hixon or the hamlet of Stowe-by-Chartley that it would connect.

It is therefore worth stressing that if effective public consultation is to be achieved and the following key objective of Stafford Borough Council's **Corporate Business Plan 2018-2021** delivered:

To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing strong communities that promote health and well-being.

then serious and proper consideration should be given to how housing developments can actually lead to an opposite effect. Some settlements are already at this "desirable" stage, which is why the residents have chosen to live there. Therefore, it needs to be remembered that significant development can change the character of an existing "attractive place to live" and "strong community", and not for the better. Such a negative impact then results in current residents leaving and what was an area that "improve[d] the quality of life" being ruined.

Therefore, Neighbourhood/Parish Plans should always be taken into account during this process, as they can prove/disprove whether developments fulfil the abovementioned criteria; otherwise, they become worthless pieces of paper that simply fulfil a requirement and offer appeasement. As such, the "Vision Statement" in *Hixon Neighbourhood Plan* states that: *...New development will be well integrated;...will help complement the rural character of Hixon Parish and maintain a strong local identity and distinctiveness of the village.* Any approval for the proposed Garden Community (Option vi. Hixon [HIX07 & HIX08]) will completely disregard, and deem *Hixon Neighbourhood Plan* as completely futile, although it was accepted by the Borough Council in 2016. Moreover, Hixon is a stable community, but the housing stock consists of mainly detached/semi-detached two-storey dwellings, with no new single-storey dwellings (i.e. bungalows) being supplied since the 1980s. In order to meet the internal housing need for both down-sizing and up-sizing, as well as level access for residents with mobility issues and the elderly, the *Hixon Neighbourhood Plan* states that at least 20% of all new-build developments include bungalows. In addition, no townhouses should be permitted because the style is not in keeping with the village.

Question 5.D (pp. 44-49, 5.14-5.25)

ii. Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

If "smaller settlements" refers to Level 6 Small Settlements in the Settlement Hierarchy and excludes Level 7 Rest of Borough (i.e. hamlets, such as Stowe-by-Chartley). Excluding Level 7 would ensure there remained a choice of environment in which to live.

Table 5.3 (p. 43; addendum) indicates that where neighbouring settlements are taken together, those along the A51 between Wolsley Bridge and Sandon, within the Cannock Chase 8km "zone of influence", have been developed far more than any other:

Haywoods, Great & Little, & Colwich: 31.7%

Hixon: 19%

Weston: 13%

Total: 63.7%

Therefore, the further development now proposed will create an urban sprawl, engulfing countryside and hamlets. Both previous and proposed development appears disproportionate in focusing on the smaller southeastern area of the borough stretching toward to the local authority boundaries of East Staffordshire in the east and Cannock in the south. Meanwhile, the majority of the borough to the west and north has seen comparatively little development.

In addition, it should be highlighted that in **Cannock Chase SAC Guidance to Mitigate the Impact of New Residential Development. February 2020**, Stafford Borough Council has reached a consensus with its partner councils that any assessment for suitability of sites for

development should always take account of the housing need assessment specific to that location; otherwise, transport and road issues would be created, which could result in a negative impact on the current community.

Consequently, opposition is expressed to the proposed development and the large number of houses proposed, which will basically create a "new town", leaving no "buffer" between the village of Hixon and hamlet of Stowe-by-Chartley, with no regard for the consequences: the comparatively miniscule existing community will not be integrated with but engulfed by the myriad number of new residents. Besides Hixon, this is too much for the hamlet of Stowe-by-Chartley, which is not a Key Service Village or development area, and it would irrevocably change the aspect of the hamlet and be detrimental to its immediate vicinity. There is also the concern that acceptance and approval for this development will set a precedent for future residential development in this rural and agricultural area when, in fact, such existing rural communities should be protected from threats of overdevelopment, particularly when near Key Service Villages.

In terms of the proposed Garden Community (Option vi. Hixon [*HIX07* & *HIX08*]), it is important to note that even though Hixon has been the focus of residential development over past 40 years, any given "large" housing developments have comprised only 20-50 dwellings. *Hixon Neighbourhood Plan* acknowledges that the scale of developments to date have allowed new residents to integrate into the community; however, it states that future residential developments should be "small scale" of no more than 30 dwellings, with which 65% of households agreed, although 26% thought it still too many.

Moreover, it has always been a serious concern that the ever-increasing expansion of Hixon would put the hamlet of Stowe-by-Chartley, which is not a Key Service Village or development area, at risk of becoming an offshoot of and eventually being integrated into Hixon. The proposal for the proposed Garden Community on Hixon Airfield seems to now confirm that this is the long-term objective.

Therefore, it is essential that *Stowe HNA* is taken into account, to which the overall response rate was 67%, which is considered a good response, as the average response to Housing Needs Surveys over the past 6 years was 35%. Of the respondents, 67% were not in favour of even one small affordable housing development for local people, with only 8% of households reporting that their current accommodation would become unsuitable within 5 years, apparently for personal preferences, such as wanting a larger garden or a lower crime rate.

In general, both longstanding and more recent residents, as well as house viewers and purchasers, express the appeal of and their satisfaction with being able to spend their retirement years living in a secure and tranquil rural area within a small, close-knit, friendly, and supportive community. In fact, the "New Homes Survey Analysis" cited in *EDHNA* discovered that of the 5 key drivers for house choice, a "Better environment" was the second most important factor, while "Transport links" was the least influential.

Question 5.E (pp. 49-50, 5.26-5.27)

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?

This would not only assist to address the deprivation and high unemployment in Stoke-on-Trent and surrounds by stimulating the local economy and job market but also such settlements already with an urban character would not suffer significant impact from any adverse change to their local character.

Question 5.P (pp. 81-83, 5.81-5.85)

Do you agree that settlements of fewer than 50 dwellings should not have a settlement boundary?

If not please provide reasons for your response including the specific settlement name.

Such settlements as included at Level 7 "Rest of Borough" in the Settlement Hierarchy, such as Stowe-by-Chartley should not be allocated a settlement boundary if this will protect from development. However, safeguards should be provided for these hamlets and surrounding countryside to prevent the threat of development being permissible right up to the settlement's "doorstep", which is the case with the proposed Garden Community (Option vi. Hixon [HIX07 & HIX08]).

Question 5.Q (pp. 83-86, 5.86-5.98)"**Do you agree with the methodology used to define settlement boundaries?****If not please provide reasons for your response.**

Settlement boundaries should exclude separate, neighbouring hamlets, and open countryside, including isolated residences between developed settlements should be retained. For instance, Hixon's settlement boundary should not reach or include the hamlet of Stowe-by-Chartley or those isolated clusters of residences along Stowe Lane that are part of Stowe-by-Chartley hamlet. In addition, settlement boundaries should respect parish boundaries, as neighbourhood plans are obliged to do. Thus, Hixon's settlement boundary should not cross over Hixon Parish boundary, which defines the area covered by *Hixon Neighbourhood Plan*.

Furthermore, in relation to **Questions 5.P & 5.Q**, specific criteria should be set for assessing development sites involving incursion into rural locations beyond settlement boundaries that take into account the impact on the existing community: both residents and environment, such as countryside and agricultural protection, noise and light pollution, tranquillity. However, the numbers proposed for rural areas in the **Strategic Housing & Employment Land Availability Assessment 2018 Draft Methodology** of 30-33 dph (dwellings per developable hectare) were considered excessive, due to the potential to more than double a community at once, which would inevitably have a negative impact on the current community.

I would like to stress that although Hixon is actually named in the Settlement Hierarchy, and is therefore assigned a settlement boundary (i.e. Residential Development Boundary (RDB)), Stowe-by-Chartley is not. This is because in both Section 5.5 of the *New Local Plan: Settlement Assessment (July 2018)* and Section 5.85 of the **Stafford Borough Local Plan 2020–2040: Issues and Options Consultation Document. February 2020** settlements "... with fewer than 50 dwellings or where there is no clearly definable village nucleus..." are "... regarded as being part of the 'Rest of the Borough'" at the bottom of the Settlement Hierarchy and are allocated no settlement boundary and not considered a development option. Such a settlement is the hamlet of Stowe-by-Chartley, which comprises a few houses along three country lanes branching off a crossroads where a church and a small pub are located, but there are no other facilities; thus, no Settlement Profile exists. However, the proposed Garden Community (Option vi. Hixon [HIX07, HIX08]), though, is located within the boundary of Stowe-by-Chartley Parish, and thus beyond both the Hixon Residential Development Boundary (RDB) and Hixon Airfield Recognised Industrial Estate (RIE), plus the boundary of Hixon Parish (covered by *Hixon Neighbourhood Plan*). In fact, it appears that the site is nearer to the hamlets of Stowe-by-Chartley and Amerton than Hixon Key Service Village.

Even the **Stafford Borough Local Plan Part 2 (2011-2031)** acknowledged that *Hixon Neighbourhood Plan*, which was accepted and approved by the Borough Council in 2016, indicated the correct RIE and RDB boundaries. Furthermore, it confirmed that the settlement boundary was consistent with *Spatial Principle 7 (SP7) – Supporting the Location of New Development*, while the Hixon Airfield RIE boundary, which lies beyond the RDB, falls well short of the proposed development sites of HIX07 and HIX08 to the west and north, respectively.

In fact, to approve this proposed development undermines the definition of a settlement boundary/RDB as providing a clear indication of where development will and will not be acceptable, and that planning applications beyond that boundary will probably be rejected.

Question 8.O (pp. 113-114, 8.36-8.37)

b) Do you think it would be beneficial to only allow people the ability to build their own homes in smaller settlements if they have a demonstrable connection to the locality of the proposed development site?

Self-build should only be permitted if by and for residents, or residents' parents/grandparents, needing accommodation more appropriate for their retirement (i.e. down-sizing, one-storey (bungalow)), and therefore will not be put on the open market once completed. In addition, I would suggest that the maximum of five dwellings should definitely not be exceeded for the whole of the existing settlement, and that those five should not be permitted on a single area of land. In fact, this could be guaranteed by stipulating the maximum area allowed for development, the maximum number of residential units within that area, and the maximum number of potential occupiers within each unit, as well as fixed densities which would prevent housing estates and closely clustered homes being built. Moreover, all designs should be in character with the neighbouring properties and hamlet as a whole. Such self-builds should have the full support of neighbours, residents, and Parish Council; otherwise, rural areas will take on an urban character.

Finally, **Ministry of Housing, Communities & Local Government, Analysis of the Determinants of House Price Changes. April 2018** states that studies have shown how issues in the local area such as changing demographics, or the volume and types of housing; road and rail traffic volume, due to environmental pollution such as air quality and noise levels, as well as traffic congestion, delays, and diversions; and location, or landscape, including tranquillity, views, and lighting levels, can effect a decline in existing house values. The *EHDNA* states that the highest median house prices are found in the rural sub-market, which includes Stowe-by-Chartley, and it is acknowledged that a 1% increase in housing supply results in a 2% decrease in house prices. However, Rural industrial estates are particularly attractive to businesses seeking easy to access sites (particularly those that use HGVs) due to being free from congestion, which raises serious concerns over: traffic volume, road capacity (e.g. width, blind bends), and road safety; traffic impact on environmental air quality and other pollutants, as well as noise pollution; and increase in congestion if in addition to housing development; all of which exert a detrimental effect on not only the current residential community but also house prices.



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

<u>Part A: Your Details</u> (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	Miss	
First Name	Julie	
Surname	Jackson	
E-mail address	[REDACTED]	
Job title (if applicable)	N/A	
Organisation (if applicable)	N/A	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 21 April 2020.**

Please note:

- Comments must be received by 12noon on Tuesday 21 April 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Stafford Borough Local Plan 2020–2040: Issues and Options Consultation Document. February 2020

Section 5 The Development Strategy

PROPOSED GARDEN COMMUNITY: Option vi. Hixon [HIX07, HIX08] and Option vii. Weston [WES01]

Question 5.G (pp. 53-56, 5.33-5.35)

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.

It is difficult to determine whether this strategy is the answer, as it appears from the seven options that there is insufficient space to create a new, self-contained, community. This leaves no choice but to extend, engulf, or connect neighbouring settlements with all the associated negative impacts, which would definitely be the case with the interdependent Option vi. Hixon [HIX07 & HIX08] and Option vii. Weston [WES01].

For the same reason, I would also suggest that it does not meet the following assessment criteria in **Ministry of Housing, Communities & Local Government Garden Communities. August 2018** for Garden Communities:

a. Clear identity...a distinctive local identity as a new garden community...

I would suggest that the reasons for the refusal of previous planning applications should be considered, such as environmental impact, impermissible change of use, and criteria in neighbourhood/parish plans. For instance, several requesting change of use from agricultural to residential have been refused on the grounds that the location is "undesirable", "unsustainable", and outside the Key Service Village of Hixon.

In addition, residents have raised considerable opposition, often in the form of vocal protests, to recent planning applications for housing developments, and this has not subsided. In relation to sites included in the **New Local Plan: Settlement Assessment (July 2018)**:

HIX05: Land to the north of Hixon on land adjacent to Rakestone, Stowe Lane, Hixon ST18 0NF: Two previous planning applications have been refused permission by Stafford Borough Council, on the recommendation of the Planning Officer, and the associated appeals to the Planning Inspectorate dismissed/withdrawn:

- for 90 dwellings with associated access on 30th April 2015 (15/21806/OUT)
 - followed by dismissal of the Planning Inspectorate | Appeal Ref: APP/Y3425/W/15/3137539 on 30th January 2017
- for 101 dwellings with associated access on 26th November 2014 (14/20863/OUT)
 - followed by dismissal of the Planning Inspectorate | Appeal Ref: APP/Y3425/W/15/3004521 on 30th July 2015

Furthermore, the same site was included in the 2016 **Stafford Borough Council. Strategic Housing Land Availability Assessment (SSHLA)** (Site ID 61), designated as greenfield, and assessed as unsuitable.

In addition, the vehicular access and entrance was considered to be unsafe taking into account the size of the proposed development, since it opens onto a narrow lane between two blind bends. There would also be a negative impact on the hamlet of Stowe-by-Chartley, which consists of narrow lanes and blind bends, due to the increase in the volume of residential traffic. Furthermore, any development of the highways in Stowe hamlet, to accommodate any necessary highway alterations/upgrades on Stowe Lane would be considered unacceptable and strongly opposed, especially in light of recent problems experienced when the hamlet (Station Road and Bridge Lane) becomes a "rat run" or diversionary route.

It is also worth highlighting other planning proposals in the same vicinity as the proposed Garden Community that have been rejected in the past:

- The site off Stowe Lane in the hamlet of Stowe-by-Chartley that was included in the 2016 SSHA (Site ID 19) was designated as greenfield used for agricultural purposes, surrounded by agricultural land. It was deemed not suitable because it was neither within nor adjacent to a sustainable settlement, plus it was considered not developable because it would require a review of the sustainable location policy to remove constraints as well as cooperation with utilities for the necessary infrastructure. In addition, a Historic Environment Record constraint exists.
- To date, planning applications concerning an outbuilding off Bridge Lane, Stowe-by-Chartley have been refused:
 - for change of use of agricultural building to dwelling refused on recommendation of Planning Officer on 29th April 2019 (18/29636/COU)
 - followed by dismissal of the Planning Inspectorate | Appeal Ref: APP/Y3425/W/19/3228798 on 15th November 2019
 - this was despite prior approval for a proposed change of use of agricultural building to a dwelling house being granted on 6th April 2018 (18/27820/PAR), following two earlier refusals on 5th January 2017 (16/25137/PAR) and 25th September 2014 (14/20905/NOTH).
 - while accumulative issues have been acknowledged with suggested alterations to Bridge Lane, which is narrower (single-vehicle width) than Stowe Lane and connects to an already busy main road (A518). In addition, the existing volume of traffic can be heavy along this lane (as well as along Station Road), due to being used: by traffic from Hixon Industrial Areas on weekdays; as an alternative official diversion or unofficial "cut-through", "rat run", via Hixon, when there are problems on the A51 and/or A518; by large delivery vehicles because of the restrictions in Hixon, which has resulted in incidences of telephone lines being brought down in the hamlet of Stowe-by-Chartley; as a route for tractors and other agricultural vehicles when busy all day every day into the late evening during harvesting, hay-baling, and muck-spreading; as well as by normal residential traffic. This also raises the issue of any impact from construction traffic during construction.
- Land adjacent to Fielden House, Stowe Lane, Stowe-by-Chartley (18/27817/OUT) was refused planning permission on 20th March 2018 for a dwelling with adjacent garage on the recommendation of the Planning Officer.
- Land off Stowe Lane, Hixon (93/29395/FUL) was refused planning permission on 30th June 1993 for a 4-bedroom detached dwelling with a 3-car garage, 4-horse stables, and a tack room, plus associated access and drainage.
- Land at Stowefields, Stowe Lane, Stowe-by-Chartley (88/22304/OUT) was refused planning permission on 21st September 1988 for two detached dwellings.

- Land adjacent to Rose Cottage, Stowe Lane, Hixon (87/20713/OUT) was refused planning permission on 14th October 1987 for a single bungalow.
- Land off Stowe Lane between Hixon and Stowe-by-Chartley (82/13263/OUT) was refused planning permission on 9th June 1982 for two new detached dwellings.
- Rural Exception Site: Land to the west of Station Road in the hamlet of Stowe-by-Chartley: to the proposal, and refusal, of an affordable housing development, which led to the **Stowe-by-Chartley Parish Housing Needs Assessment. 2019**, as well as requests and queries from residents to the Parish Council about producing a Parish/Neighbourhood Plan that would assist with preventing the threat of urbanization and associated issues, such as now faced by the proposals in the **New Local Plan 2020-2040**.

It should also be noted that designating Hixon Airfield as "Brownfield" is erroneous, because the term excludes:

- land that is or has been occupied by agricultural or forestry buildings;
- land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Source: https://www.planningportal.co.uk/directory_record/444/previously_developed_land_or_brownfield_land

In addition, the fact that the high-pressure Sandon/Drayton Bassett National Grid Gas Pipeline crosses through the middle of the site in a north–south direction cause concern within such a major development, despite the requirement for a minimum 15m protective buffer zone either side of the pipe.

Although both the *Current Local Plan 2011-2031* and *New Local Plan* class Hixon is a Key Service Village, the *Current Local Plan* also stated that only 12% of the housing supply for the whole borough was to be provided across all the 11 Key Service Villages, of which Hixon remains the smallest. However, the housing development that has been completed has outstripped the capacity of current health and school facilities, for which no expansion was planned despite the expected increase in population, and it appears there are still no plans, or guarantees, to change the current facilities in the future. In fact, following an analysis of the survey for *Hixon Neighbourhood Plan (2011-2031)*, 87% of respondents said the provision of a doctor's surgery/ health clinic needed improvement, which the Parish Council has prioritised for action if possible.

It should be pointed out that Hazeldene House surgery in Great Haywood withdrew the outreach clinic in Hixon a few years ago and is unable to reinstate the services, due to lacking the capacity to support the growing patient list, and it has become increasingly difficult to book appointments without at least a month's delay. It should also be stressed that the surgery's catchment area includes not only Stowe-by-Chartley, Hixon, and Weston but also reaches as far as Corporation Street in Stafford and Stafford MOD to the west, Sandon to the north, Wolsley Bridge to the south, and Amerton and Admaston to the east. Moreover, the primary school, and only school, in Hixon is oversubscribed, meaning many families have to transport their children outside the village.

The local Clinical Commissioning Group and Local Education Authority (i.e. Staffordshire County Council) are funded nationally by the NHS and central government; therefore, they have to not only determine but also budget for the healthcare and educational services provided in each specific area. However, to date, due to the restricted funds available and the many priorities/demands to be satisfied across the county, it is often the case that only the minimum requirements can be fulfilled, while extending current provision cannot be guaranteed, and may even be shelved at a later date in response to more urgent need elsewhere. Consequently, neighbouring settlements to Hixon, such as the hamlet of Stowe-

by Chartley, and Weston (where development is required to ensure the Garden Community is fully serviced and viable), cannot be considered potential development sites.

What is more, the viability of the proposed Garden Community relies on cooperation from separate private sector businesses and authorities with independent budgets, already under pressure in the current economic depression, and other priorities, far more wide-ranging than the extent of Stafford Borough:

- Staffordshire County Council, the local highways authority, which faces many challenges in affording highway maintenance and repair.
- Network Rail & Train Operating Companies for tracks, stations, and train services.
 - Full co-operation and investment from transport (bus and rail) companies and the highways authority would be required for not only the initial capital but also with maintenance, staffing, and operating costs.
- Multiple businesses and shops, both independent and part of larger franchises/companies, which offer employment opportunities and retail outlets – although many retail companies are rationalising and reducing their outlets in favour of larger centrally located premises and online shopping alongside home deliveries.

In addition, it was stated in the *Current Local Plan* that Hixon lacks a range of retail facilities for its size, and it is worth highlighting that many of the facilities remain the same despite the increased population. In fact, there have been significant changes over less than 12 months that means the Settlement Profile produced for Hixon in the *New Local Plan: Settlement Assessment (July 2018)* should be updated, especially it also contains errors:

- There is now only one public house with restaurant, not two.
- There is no post office: the convenience store provides basic Royal Mail services only, meaning regular visits are made to either Great Haywood/Wolsley Bridge.
- The small convenience store stocks only essential items.
- The "other multiple retail outlets" (i.e. not the Chinese Take-Away of Fish & Chip Shop) actually refer to a barber and a hairdresser; there is no longer a pet shop.
- There is only one primary school and no secondary school, for which school transport is provided.
- There is only one village hall, called Hixon Memorial Hall, not two.

Furthermore, while it is true that broadband has been made available, access is only possible at a significant additional cost, is far from reliable, and is certainly not "superfast". Indeed, in response to the survey for *Hixon Neighbourhood Plan (2011-2031)*, residents judged the broadband/mobile phone network to be unsatisfactory.

In addition, there are similar errors in the Settlement Profile for Weston:

- There are 3 not 4+ food/drink establishments.
- There is no post office but simply an outreach service from Hixon provides very basic post office services for just three hours on two weekday mornings per week.

Likewise, the *Settlement Assessment* regards public transport as a "good bus service", but it comprises an hourly bus service taking a lengthy and roundabout between Stafford and Uttoxeter (D&G 841) only, operating between 8am and 6:30pm on weekdays, with no Sunday Service. This has resulted in more people commuting far more and traffic has increased with recent housing development in Hixon; therefore, further development would be detrimental to existing and future residents. Moreover, during the consultation for *Hixon Neighbourhood Plan*, current residents rated the bus service as unsatisfactory.

An additional objection against the proposed Garden Community Garden Community (Option vi. Hixon [HIX07 & HIX08]) is that it is situated within an extensive and longstanding agricultural area, where such land is still heavily used and in demand for mixed farming purposes. In addition, approval for such a major residential development raises worries that the remaining agricultural land will eventually be lost, especially as developers' interest in greenfield will be encouraged. Therefore, it is requested that existing rural communities,

such as Stowe-by Chartley are protected from threats of overdevelopment, particularly when near to Key Service Villages, such as Hixon.

Furthermore, with the negotiation of new European trade agreements following Brexit, there is a greater possibility that the demand for a domestic food supply becomes greater in the coming years. Consequently, there would appear to be a demonstrable need for retaining agricultural land rather than changing its use to residential accommodation.

Finally, the **National Planning Policy Framework (rev. Feb 2019) – 9 Paragraph 109** advises that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'.

Road upgrades would not only affect Stowe and Bridge Lanes, but also those through Stowe village (Station Road and Drointon Lane), which are very narrow country lanes, sometimes only a normal car width, with few if any passing places, as well as sharp, blind bends. This is not conducive to safe development, particularly considering the lack of safe pedestrian pathways in such lanes. To adapt these lanes would significantly and negatively impact on the current residential community and environment, due to infringement, and possibly compulsory purchasing (with the question of receiving market value) of residential properties and gardens, and farmland, to the consequent detriment of associated wildlife and habitats. Thus, this development would affect far more than the immediate development site.

If necessary, the following proposed locations for a Garden Community might be considered:

Option i. Land north and east of Gnosall.

Option ii. Land between Gnosall and Haughton, north of the A518 between Stafford and Newport.

Both options appear to offer locations for a true, self-contained Garden Community, being situated within 4-7 miles of Stafford via the A518 and with access to the M6, and without appearing to have a direct impact on the existing communities.

Option iv. Meecebrook, focussed around Cold Meece, south of Swynnerton.

It is possible that this option offers a self-contained Garden Community, being situated approx. 10 miles from Stafford and 5 miles from Stone, as well as in proximity to HS2; however, consideration should be given to the risk that Meecebrook and Yarnfield could become a "rat run" to the A34.

However, after reviewing **AECOM Ltd. Stafford Borough Strategic Development Site Options. December 2019**, it is clear that the evidence base is quite restricted:

- The majority of the appraisal is based on desktop studies of:
 - Borough Council strategies and policies
 - national planning policies and guidance
 - internationally, nationally and locally protected sites by either Acts of Parliament or statutory bodies
 - EA Flood Zones
 - deprivation indices for the area
 - GIS mapping
- The report takes no account of:
 - the local area's character
 - the significance of "undesigned"/ "unscheduled"/ "unregistered" habitat and heritage assets locally
 - the limited flood risk assessment reflected in Environment Agency Flood Zones and the importance of area-wide rather than site-specific planning for flood management
 - the nature of the existing communities and residents in terms of lifestyle preferences and daily life
 - traffic flows and volume



**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	Miss	
First Name	Julie	
Surname	Jackson	
E-mail address	[REDACTED]	
Job title (if applicable)	N/A	
Organisation (if applicable)	N/A	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 21 April 2020.**

Please note:

- Comments must be received by 12noon on Tuesday 21 April 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Stafford Borough Local Plan 2020–2040: Issues and Options Consultation Document. February 2020

Section 9 Delivering Quality Development

Question 9.H (pp. 122-123, 9.30-9.32)

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

If so, please explain where.

Question 9.I (pp 124-126, 9.33-9.38)

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?

I would suggest that the proposed development site does not meet the following assessment criteria **Ministry of Housing, Communities & Local Government Garden Communities. August 2018** for Garden Communities:

e. *Strong local vision and engagement...*

designed and executed with the engagement and involvement of the existing local community...

should include consideration of how the natural and historic environment of the local area is reflected and respected.

However, there has been overwhelming opposition in Hixon, Stowe-by-Chartley, and Weston, as well as a disregard for the natural and historic environment.

Hixon Neighbourhood Plan (2011-2031), which Stafford Borough Council confirmed as covering the whole of Hixon parish in 2013, states in its "Vision Statement" "*any new development will...maintain a strong local identity and distinctiveness...*" Consequently, **Parish Objective 5** aims "*to identify other buildings and sites that are heritage assets so that they may be protected from neglect or adverse development and where appropriate put forward for statutory or local listing or other protected status*" and specifically mentions Hixon Airfield, which is now classed as an undesignated Heritage Asset*.

*Heritage Assets are defined as: "*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage Assets include designated heritage assets and assets identified by the local planning authority (including local listing).*"

In fact, in Stafford's **Current Local Plan 2011-2031**, the County Archaeologist acknowledges the potential of below-ground archaeology associated with the wartime airfield use and advises consideration to be given to the impact on the setting of the former runway and wider landscape by development.

Hixon Airfield [HIX07]

Monument Number: 1397674

National Monuments Record (NMR) Number: SJ 92 NE 31

HER Number: 20064

Location: SJ 99175 26348 SJ 993 266 SJ 9953 2669 SJ 9928 2644

This is a former World War II and post-war military airfield within Stowe-by-Chartley parish that was built to Class-A bomber airfield standards and designed as a parent station to satellite sites at Whitchurch Heath and Seighford by the Ministry of Defence. Opened in 1942, it comprised three concrete and tarmac runways and landing places, 30 hardstanding

for heavy bombers, four T2-type and one MAP B1-type aircraft hangars, and the 1941-pattern control tower, plus two incendiary bomb stores, a fuse and spare bomb store, and a technical area. Temporary accommodation for up to 2393 RAF personnel and 445 WAAFs was also provided on at least 12 military camps to the south (SJ 9967 2513) off Pasturefields Lane and an additional one to the north (SJ 9991 2787) on the opposite side of the A518. In addition, a depot was located at the junction of the A518 & A51 (SJ 9795 2725), as well as a military hospital complex (SK 0044 2559) at Grange Farm off Egg Lane in Hixon itself.

Several structures survive, including:

- the runway
- three hangars
- the control tower
- air raid shelter (SK 0042 2555)
- pillbox, with possible 'annexe', off Bridge Lane, (SK 0020 2730) overlooking the hamlet of Stowe-by-Chartley to the east and airfield to the west
- remains of four possible World War II Nissen Huts, probably associated with RAF Hixon Airfield, located either side of a possible clay pit or quarry (HER Number: 57606; Location: SK 0024 2703) to the west of and parallel with Stowe Lane on the route of a proposed pipeline between Stowe-by-Chartley and Hixon (late 2000/early2001), with steps indicating doorways, while smaller, possibly latrine, buildings positioned down-slope (SK 0028 2708 & SK 0027 2696)
- parts of the hospital complex: Main Hospital Block and Annexe, possibly a decontamination unit (SK 0042 2554); Picket Post (SK 0047 2566); possible Ambulance Garage/Mortuary (SK 0045 2559)

Also, it is thought that some earthworks/cropmarks on aerial photography may actually be associated with the runway construction and military features of the RAF Hixon Airfield^a. From 1942 to June 1945, the airfield was part of No. 93 Group Bomber Command and was used by: No. 30 Operational Training Unit (30 OTU) for night bomber crews flying Vickers Wellingtons; 1686 Bomber Defence Training Flight (BDTF) flying Curtiss Tomahawks and Hawker Hurricanes; and No. 12 (Pilots) Advanced Flying Unit ((P)AFS) flying Bristol Blenheims. Furthermore, Hixon-based crews frequently took part in night-time psychological warfare operations over France and Germany, dropping propaganda leaflets; while 30 OTU was tasked with Air Sea Rescue from January 1944.

Hixon Airfield was also the site of two notable events during the Second World War:

- Following the British Government lifting the 'colour bar' on military service eight weeks after war was declared, only the RAF took advantage at first. One of the 400 Caribbean & West African volunteers selected as aircrew, Cy Grant from British Guyana, was accepted as a navigator by 30 OTU at Hixon.
- As the United States Army Air Force (USAAF) was based at Stone, a myriad of American aircraft visited Hixon, and General Patton landed at Hixon when visiting the Prisoner of War camp located close to Rugeley.

Moreover, as a training base, Hixon experienced many crashes, some fatal^b:

- **1943**
 - July & September* – two Wellington bombers crashed, both killing all six crew
 - August & October* – two Wellington bombers, both injuring all five crew
 - December* – Tomahawk bomber, luckily no injuries or fatalities
- **1944**
 - February* – Wellington bomber, four crew escaped flames, one had to be rescued by a civilian, but died from injuries next day, while the civilian was hospitalised for five months recovering from burns and was then awarded the British Empire Medal (BEM).
 - March* – Two Tomahawks, luckily no injuries or fatalities
 - July & November* – Two Wellington bombers, destroyed by fires, luckily no injuries or fatalities
 - August* – Wellington bomber, luckily no injuries or fatalities

- **1945**

April – Beaufort, pilot killed

May – Four Beauforts, of four pilots, two injured and another treated for shock

November – Spitfire, luckily no injuries or fatalities

However, the number of military airfields has steadily declined since the war, mainly due to housing developments, eradicating the memory of those who flew from these airfields and lost their lives.

From June 1945 until its closure in 1957, the airfield was used by No. 16 Maintenance Unit (16 MU) as an Air Equipment (Storage) Unit for the returned and surplus military equipment at RAF Stafford after the end of the war.

The site was sold in August 1962 into private ownership, with the technical part of the site being converted into the current Industrial Estate and the control tower into office space.

Parts of the actual airfield around the runways has been under agricultural use, but to date, there have been no efforts to safeguard and raise awareness of the area's historical significance, rather to simply erase it from memory by development.

^a **Monument Numbers:** 1575492, 1572135, 1572142

National Monuments Record (NMR) Numbers: SJ 92 NE 62, SJ 92 NE 39, SJ 92 NE 40

Locations: SJ 99217 26807, SJ 99235 26904, SJ 9924 2689, SJ 98544 26615, SJ 9853 2662

^b **Midland Aircraft Recovery Group** [a member of the British Aviation Archaeological Council]

As is evident, Hixon and Stowe-by-Chartley parishes share a joint historical and current interest in the World War II Hixon Airfield.

Although the airfield is the most significant heritage asset, there are other such assets present:

1. Site of Chartley & Stowe railway station on the Stafford and Uttoxeter Railway opened in 1867, closed to passengers 1939, and to goods in 1951.
Monument Number: 502314
NMR Number: SK 02 NW 34
Location: SK 00 27
2. Lower Booth Farmhouse built in the 14thC and altered in the 16thC, early to mid 17thC, and 18thC.
Monument Number: 542422
NMR Number: SK 02 NW 33
Location: SK 00 27
3. A large number of medieval/post-medieval field boundaries, visible as cropmarks, many of which are respected by medieval/post medieval ridge and furrow (4), while most of which align to or are clearly associated with the post-medieval enclosure system.
Monument Number: 1575492
NMR Number: SJ 92 NE 62
Location: SJ 99217 26807; SJ 9928 2679
4. Medieval/post-medieval ridge and furrow, visible as earthworks and cropmarks, much of which respects the medieval/post-medieval field boundaries (3).
Monument Number: 1575481
NMR Number: SJ 92 NE 58
Location: SJ 99308 27236; SJ 9937 2719
5. A probable medieval/post-medieval field boundary, visible as an earthwork, defined as a ditch.
Monument Number: 1579548
NMR Number: SK 02 NW 68
Location: SK 00206 26982; SK 0020 2698
6. A probable Bronze Age round barrow, visible as a cropmark, defined by a circular ditch with an internal diameter measuring 32m. The barrow lies 73m east of a smaller probable barrow, with which it may be associated (7).
Monument Number: 1572135
NMR Number: SJ 92 NE 39
Location: SJ 99235 26904; SJ 9924 2689

7. A probable Bronze Age round barrow, visible as a cropmark, defined by an intermittently visible double ring-ditch with an internal diameter measuring 15.5m. The barrow lies 73m west of a larger probable barrow with which it may be associated (6).
Monument Number: 1575485
NMR Number: SJ 92 NE 60
Location: SJ 99134 26916; SJ 9913 2691
8. A probable Bronze Age round barrow, visible as a cropmark, defined by an intermittently visible circular ditch with an internal diameter measuring 12m.
Monument Number: 1572142
NMR Number: SJ 92 NE 40
Location: SJ 98544 26615; SJ 9853 2662
9. 18th-20thC pottery and miscellaneous fired clay fragments (possibly saggars that held and protected pottery during kiln-firing) spread along the route of a proposed new pipeline between Stowe-by-Chartley and Hixon, late 2000/early 2001, to the north of Mount Cottage.
Historic Environment Record (HER) Numbers: 57603 & 57610
Locations: SK 00 27 & SK 00 26
10. 19thC pottery and clay pipe fragments, spread along the route of a proposed new pipeline between Stowe-by-Chartley and Hixon, late 2000/early 2001.
HER Number: 57609
Location: SK 00268 26639
11. Possible remains of clay pits or quarries, to the west of Stowe Lane, along the route of a proposed pipeline between Stowe-by-Chartley and Hixon.
HER Numbers: 57606 & 57607
Locations: SK 0024 2703 & SK 0023 2709
12. Amerton Heath Farm, Stowe-by-Chartley – an isolated farmstead laid out around a loose, single-sided yard with the farmhouse long side on to the yard, which still stood in the late 19thC but was built over by RAF Hixon in the mid-20thC.
HER Number: 57617
Location: SJ 9971 2712

An apt comparison can be made with Hopton Heath, the English Civil War Battlefield, where no above-ground heritage survives from 1643, and part has been taken over by an RAF depot while the remaining is an agricultural/farming area. However, it is now recognized and included on the National Heritage Lists, although only acknowledged recently by a memorial in 2009.

It is worth noting that even those bodies concerned with the environment and conservation recognise the importance of culture and heritage.

Natural England^c mentioned that landscape features, such as the dominant hedgerow networks, are highly valued not only as wildlife habitats but also for their links to local culture, history, and archaeology. The protection and enhancement of the landscape as a whole would retain a sense of place and history and prevent damage to archaeological features, particularly below ground, and improve the setting of historical features that add to the local character.

Unfortunately, the continual and increasing trend in new development in and around villages is cumulatively changing and impacting on this intrinsic and distinctive local character, which has adverse implications for below-ground archaeological resources.

This concern is enshrined by the "NCA Statement of Environmental Opportunity" in *SEO3 – protect historic and cultural features of traditional settlement patterns of remaining villages.*

^c**Natural England. State of the Natural Environment. 2008. Chapter 3. Biodiversity, Section 3.6 Arable, Orchards and Hedgerows; Natural England Technical Information Note TIN066. Arable Reversion to Species-rich Grassland: Site Selection and Choice of Methods. June 2010; Natural England. National Character Area Profile: 68. Needwood & South Derbyshire Claylands. 2012**



**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	Miss	
First Name	Julie	
Surname	Jackson	
E-mail address	[REDACTED]	
Job title (if applicable)	N/A	
Organisation (if applicable)	N/A	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number		

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 21 April 2020.**

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Stafford Borough Local Plan 2020–2040: Issues and Options Consultation Document. February 2020

Section 9 Delivering Quality Development; Section 10 Environmental Quality

Question 9.H (pp. 122-123, 9.30-9.32)

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

If so, please explain where.

Question 10.A (pp. 133-134, 10.4-10.8)

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:

c) Enforce Air Quality Management Zones around areas of notable biodiversity importance?

The proposed Garden Community (Hixon [HIX07, HIX08] and Weston [WES01]) is considered unacceptable because **Policy C5 Residential Proposals outside the Settlement Hierarchy – A. New Development** states that the criteria of **Spatial Principle 7 (SP7) – Supporting the Location of New Development** should be fulfilled, but it is not in accordance with the following criteria for defining Settlement Boundaries:

f) will not impact adversely on the special character of the area, including not impacting on important open spaces and views,...

In fact, it will create an urban sprawl from Weston to Stowe-by-Chartley, basically turning the village of Hixon and hamlet of Stowe-by-Chartley into a small town.

g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected;

The proposed development fails to consider the **Staffordshire Biodiversity Action Plan (BAP)** targets and the *England Forestry Strategy* key actions, particularly in relation to those specific guidelines that are relevant to Hixon Airfield and its surrounds.

h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;

The site poses a potential risk to Chartley Moss and Pasturefields Saltmarsh SACs, and the surrounding supporting habitats, as well as bird-nesting and wetland/woodland habitats on Hixon Airfield itself.

In addition, the **National Planning Policy Framework (NPPF) Chapter 15 Paragraph 180(b)** recognises tranquillity in stipulating that planning policies and decisions should ensure that new developments consider the potential sensitivity of not only the site but also the wider area to the resulting impacts, including: potential adverse impacts resulting from noise, particularly on health and the quality of life, are avoided; tranquil areas that have remained relatively undisturbed by noise and are therefore valued for their recreational and amenity value for this reason are protected; and the impact of light pollution from artificial light on intrinsically dark landscapes and nature conservation is restricted.

Although **Hoskin, R., Liley, D. & Caals, Z. (2020) Habitats Regulations Assessment of the New Stafford Borough Local Plan: Issues and Options. January 2020** only reviews the impact of developments on species and habitats of nearby European wildlife sites highlights the strong body of evidence that increasing urbanisation and road traffic, even over a wide area (i.e. "zone of influence") beyond the boundary of a wildlife site, negatively impact habitats and wildlife. In particular, large developments and issues with water quality and resources can compromise the ecological integrity of hydrologically sensitive European site, while higher traffic volumes pose a potential risk to air quality. Consequently, this initial

review emphasises potential issues with the proposed Garden Community (Hixon [*HIX07*, *HIX08*] and Weston [*WES01*]), which are in close proximity to the European sites of Pasturefields Saltmarsh SAC, which has "UK special responsibility" designation, and Chartley Moss SAC, which is also classed as a Ramsar site. It also criticises Stafford's ***New Local Plan 2020-2040*** for not fully acknowledging the implications of the location of development, as well as housing and employment numbers, and air quality and any new/improved transport infrastructure on European sites, plus a poor awareness of the link between rural, biodiversity, and health and wellbeing.

With regard to Pasturefields Saltmarsh, which is Natural England has previously raised concerns with Stafford Borough Council relating to both water and air quality. Assessments have identified sensitivities and indirect impact pathways originating from development at a considerable distance away, particularly in terms of water pollution and traffic emissions. In general, risks to both water quality and quantity (i.e. availability), as well as flood management issues exist: greater abstraction can influence water flow and quantity, resulting in reduced water availability at certain periods or changes in flow, which impacts particularly on aquatic and wetland habitats. Water enrichment as a result of discharges from waste-water treatment works or run-off sewage overflow can increase nutrient loads and watercourse contamination once a development is completed. Meanwhile, atmospheric pollutants of concern to sensitive habitats are derived from vehicles, including: nitrogen oxides (NO_x) and ammonia (NH₃), and the consequential increase in and deposition of nitrogen (N) and acid on habitats; other pollutants, such as sulphur and ammonia, leading to changes in species composition, increased risk of frost damage in spring, increased sensitivity to drought, increased pest and pathogen attacks, and direct damage to sensitive species; as well as indirect impacts of acid deposition due to pH changes in soils and water leading to nutrient deficiencies, release of toxins, and changes in microbial N transformations.

In particular, Chartley Moss, both a West Midlands Mosses SAC and Midlands Meres and Mosses Phase I Ramsar site, is susceptible to several specific threats, including water pollution, hydrological changes, air pollution with a risk of atmospheric nitrogen deposition, and habitat fragmentation.

The report also points out issues arising from recreational activities, the impact of which is particularly relevant to Cannock Chase SAC. The proposed Garden Community lies within the "zone of influence" for Cannock Chase and Stafford Borough Council is a member of the Cannock Chase SAC Partnership, which has itself commissioned studies on the strategic approach to mitigating recreational pressures that have demonstrated the impacts experienced due to housing developments. In addition, a further evidence review is being commissioned in 2020, due to the new developments, particularly large concentrations of growth such as within a new Garden Community.

Moreover, the report criticises the *New Local Plan*: for not taking proper account of the risks to the functionality and the vulnerability to climate change of habitats supporting European sites; ensuring that the wider biodiversity underpinning the protection and long-term maintenance of those European sites is adequately protected; and simply focusing on protecting the existing environment and minimising or preventing loss of biodiversity while neglecting opportunities for environmental restoration and enhancement as well as gains in biodiversity.

Furthermore, the HSM02 route option for HS2 that would have run to the north-west of Pasturefields, passing through predominantly arable and improved grassland fields, and intersecting Hixon Industrial Estate, was rejected. The reason was the potential impact on Pasturefields Saltmarsh SAC due to changes in the pollution of or groundwater flow regimes, originating in the area to the northeast between the hamlet of Stowe-by-Chartley and Weston, that contribute saline water to the saltmarsh. ***High Speed Rail (West Midlands -***

Crewe) Environmental Statement. Volume 5: Technical Appendices Ecology and Biodiversity. Habitats Regulations Assessment Screening Report for Pasturefields Salt Marsh Special Area of Conservation (EC-017-003). July 2017 even referred to the fact that the probable expansion of all three Hixon industrial estates could lead to greater emissions to air and water that would likely have a significant effect, either individually or in combination, on the quality of the Pasturefields Salt Marsh SAC.

Earlier **Staffordshire County Council, Development Services Department (2000) Planning for Landscape Change: Supplementary Planning Guidance to the Staffordshire and Stoke on Trent Structure Plan 1996 – 2011** advised taking landscape character into consideration. According to **Volume 3: Landscape Descriptions (Specific to Stafford Borough) (Adopted 2001) Chapter 6: Regional Character Area 68 - Needwood Claylands**, the proposed Garden Community (Hixon [HIX07, HIX08] and Weston [WES01]) lies within a landscape of "Settled and Settled Plateau Farmlands", characterised by an undulating pastoral landscape consisting of a network of narrow, often sunken, lanes with dispersed hamlets, villages, and clustered farmsteads that lend the landscape a peaceful, rural feel. However, villages and hamlets in this landscape have been subject to considerable urban creep, resulting in such incongruous features as: busy road corridors that lead to small lanes rapidly turning into "rat runs"; modern housing; localised electrified railway lines; and large-scale industrial buildings. It is also a mixed farming area with land of average, Grade 3, agricultural quality, two-thirds of which support dairy farms and some beef and sheep farms, while the arable farmland comprises mainly combinable crops, including cereals and oilseed rape. All of these types of farming are undertaken around Stowe-by-Chartley and Hixon, with cereal and oil rapeseed crops still being cultivated across the proposed development site, including around the runways of Hixon Airfield. Furthermore, as part of the "Settled Farmlands" landscape character area (LCA), Hixon and Stowe-by-Chartley sit within strongly rounded or sloping valleys with steeper slopes associated with narrow stream valleys draining the plateau area, which is an important consideration in flood management.

Stafford Borough Council have previously been considered LCAs in planning decisions, recognising the characteristic features of farmlands:

- a varied pattern of strong irregular small-to-medium sized hedged fields, with smaller, more intact fields around settlements;
- networks of narrow lanes and clustered farmsteads, which lend the landscape a peaceful, rural feel;
- hedge banks and hedgerows, which contribute substantially to the landscape character;
- a scatter of small woodlands, often of ancient origin, including broadleaved woodlands, which are prominent not only on the upper slopes but also on a smaller scale along narrow streams and winding lanes leading to the plateau farmlands;
- ancient village settlements.

Such are the locally distinctive features and patterns that are important to protect and maintain through restoration and regeneration of woodland and hedgerow, as well as their associated habitats.

However, the quality of this landscape is limited and threatened by the particular loss of its characteristic and distinctive ancient woodland and hedgerows, as well as semi-natural grasslands. It is particularly sensitive to the impact of urban development and land use change, resulting in the appearance of incongruous features.

Protecting existing and planting new woodland has been described as of a high potential value in the landscape to the west of Hixon, where a considerable amount of large-scale broadleaved woodland planting, including a conifer element, alongside hedgerow tree planting in the landscape would be appropriate. Such innovative landscape regeneration would provide a structural element to the landscape, screening and acting as a foil for the

large scale industrial developments. Furthermore, the planting of larger woodlands would be particularly appropriate, because as an example of land formerly used for human activity, it would fulfil the key actions in the government's *England Forestry Strategy*. Moreover, strategic siting of new native woodland would reduce the effects of fragmentation and isolation of woodlands and habitats.

In fact, targets in the *Staffordshire BAP* emphasise the potential value of providing and managing habitats provided by woodlands and hedgerows. Both broadleaved and wetland woodlands are classed as a medium to high priority for regeneration, restoration, maintenance, and enhancement, while the further loss of wetland woodland should be avoided and their number actually increased. The same priority levels are also assigned to hedgerows, with existing ones being restored and maintained and new species-rich ones planted.

Indeed, ***Staffordshire Wildlife Trust The State of Staffordshire's Nature. 2016*** states that preserving wildlife and habitats supports physical and mental health, and wellbeing. However, the habitats that currently exist on Hixon Airfield are those considered to be under threat: grassland has suffered a significant loss since the mid-20thC and is still threatened by urban and infrastructure development; wetlands are threatened by not only urban development but also pollution from industrial development; and plants are in decline and there is even a loss of ground flora, both of which are under threat from the deterioration and loss of hedgerows and increase in transport volumes.

Similarly, ***Staffordshire Wildlife Trust. Stafford Borough Nature Recovery Network Mapping – Final Report. 2019***, as well as ***Staffordshire Biodiversity Action Plan. 2015. Central Farmland Ecosystem Action Plan***, clearly identify the key threats to areas such as Hixon Airfield as urban encroachment and habitat fragmentation, the level of which is a direct result of human activities.

In particular, around the proposed development site, *Planning for Landscape Change* shows that Hixon Airfield lies within a landscape regeneration policy zone, with active landscape conservation and enhancement being conducted north of the A518, due to being of the highest landscape sensitivity. Furthermore, the hamlet of Stowe is in a landscape restoration policy zone, and landscape enhancement is supposed to be practised west of Stowe Lane. Finally, the proposed development site in Weston is located in a landscape maintenance policy zone, where landscape enhancement operates and there is a risk of a loss of character and quality. Moreover, the whole of this area is situated within the "zone of influence" for Cannock Chase SAC, an Area of Outstanding Beauty (AONB), which has the highest landscape sensitivity.

In fact, both the village of Hixon, including the former airfield, and hamlet of Stowe-by-Chartley lie within not only the 15 km but also the 8km "zone of influence" for Cannock Chase Special Area of Conservation. As such, they fall within the remit of ***Cannock Chase SAC. Guidance to Mitigate the Impact of New Residential Development. February 2020***, whereby any proposed developments involving a net increase of one or more dwellings will exert a negative impact on its integrity. Furthermore, lying within the 8km zone will exert the greatest impact and may entail further financial contributions of 58% to be administered through Stafford Borough Council. Moreover, to be fully served and viable, the Garden Community will depend on housing development in Weston, which also lies within the "zone of influence" as well as the Trent and Mersey Canal Conservation Area.

Planning for Landscape Change has since been confirmed and extended by ***Natural England National Character Area Profile: 68. Needwood & South Derbyshire Claylands. 2012***, in that the proposed Garden Community poses a potential threat this NCA's characteristic feature of tranquillity, which is defined in terms of quiet areas and lanes, as well as a network of public footpaths across open land, in undulating pastoral landscapes.

However, such areas have experienced a significant decline since the 1960s, and Natural England have advised taking opportunities to preserve the remaining undisturbed areas by reducing inappropriate development outside existing settlements and preventing urban sprawl, because the quiet enjoyment of rambling through rural areas and villages is important recreation for walkers and cyclists, both of which are familiar sights in this area. Development pressure from transport infrastructure also threatens the undisturbed pastoral landscape and particularly leads to the loss of hedgerows.

In fact, the Campaign for the Protection of Rural England (CPRE) 2006 map of tranquillity revealed that rural areas to the south and west of Uttoxeter scored highest, but CPRE's 2007 intrusion map showed the extent to which the rural landscape had been disturbed by urban development due to noise, primarily from impact of traffic using such main roads as A518, was greater in the same areas. Overall, the trend in such intrusion on tranquil areas has been steadily increasing since the 1960s, and CPRE ranked the county as 28th among local authorities for the proportion of total disturbed area (59.7%) in 2007. Consequently, this landscape does require protection and enhancement to preserve the relative tranquillity. Thus, to provide inspiration and tranquillity, the hedgerow network should be maintained and strengthened and the local settlement pattern respected.

Indeed, ***Natural England Technical Information Note TIN066. Arable Reversion to Species-rich Grassland: Site Selection and Choice of Methods. June 2010*** expresses disappointment that the many opportunities and benefits areas such as Hixon Airfield offer are being either overlooked or ignored. For instance, protection and enhancement would provide landscape benefits, from the public point of view, such as improving the wider perspective.

Hixon Neighbourhood Plan (2011-2031) incorporated these recommendations in ***Parish Objective 4:...****To ensure new development helps contribute to local health and wellbeing through increased participation in outdoor physical activities, walking and cycling. To ensure the natural environment and wildlife are protected against potentially damaging development or practices.*

Specifically, the intention is to not only protect and enhance the existing open spaces but also provide diverse open spaces and woodland, highlighting the shortage of publicly accessible woodland and wildlife meadows throughout the parish. Indeed, 65% of residents supported having more parks and open spaces, and 70% supported having a nature reserve. In fact, the former airfield site boasts up to 74 different species of birds, nearly half of which are classified as being at significant risk, and it is thought to be the most important remaining site in lowland Staffordshire for skylarks. In addition, a number of footpaths transverse the airfield as part of a network that criss-cross the parish providing both internal connectivity and links to neighbouring communities.

I would also suggest, therefore, that the proposed development does not meet the following assessment criteria in ***Ministry of Housing, Communities & Local Government Garden Communities. August 2018*** for Garden Communities:

e. Strong local vision and engagement...designed and executed with the engagement and involvement of the existing local community...should include consideration of how the natural and historic environment of the local area is reflected and respected.

There is considerable opposition in Hixon, Stowe-by-Chartley, and Weston from residents to the proposed development, while there appears to be a complete disregard for the natural environment.

g. Healthy places...designed to provide the choices and chances for all to live a healthy life,...

h. Green space...generous, accessible, and good quality green and blue infrastructure that promotes health, wellbeing, and quality of life, and considers opportunities to deliver environmental gains such as biodiversity net gain and enhancements to natural capital.

The proposed development will result in a significant reduction to an existing area that already promotes health, wellbeing, and quality of life, as well as threaten current biodiversity and the natural capital, particularly where it is fragile and at risk of deterioration.

I would also like to point out that assessments of proposed developments and planning applications have previously focused only on "designated areas" for conservation, having little regard for existing habitats without any "official status"; however, those areas now recognised as requiring protection and enhancement are often as a result of earlier developments destroying such sites. Therefore, I would argue that more consideration should be given to sites that support wildlife not only on the site itself but also on adjacent areas, as well as specific species at particular times of the year, especially when those sites possess unique attributes in the area.

In fact, **Stafford Borough Local Development Framework Ecological Desk Study, 2008** reveals that previous surveys and reviews of parts of the proposed development site have identified its importance in terms of habitats supporting protected and threatened species that should be maintained and enhanced:

- On the arable fields bordered by hedgerows with trees to the west of Stowe Lane, near Mount Cottage, as well as on the fields combining agriculturally improved and semi-improved grassland with scattered scrub/trees, adjacent to Mount Farm, protected Brown-Long Eared Bats have been recorded with the possibility of roosting in adjacent barns. In addition, on the field north of and adjacent to Greenfields in Hixon that comprises agriculturally improved grassland, hedgerows with trees, and a ditch system, two protected species of bats, Brown-Long Eared and Pipistrelle, have been recorded within the locality and are thought to be roosting in the adjacent house/barn. The large trees, mainly within the hedgerows, in all three locations could also support roosting potential, while the extensive hedgerow network may be supporting foraging and flight routes and should be retained.
- On the arable area just south of the main runway, adjacent to the current RIE boundary, as well as on the arable land to the west of Stowe Lane, *UK Biodiversity Action Plan* farmland seed-eating birds have been recorded, supporting the protected Yellowhammer, Tree Sparrow, ground-nesting skylarks, and lapwings.



**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	Miss	
First Name	Julie	
Surname	[REDACTED]	
E-mail address	[REDACTED]	
Job title (if applicable)	N/A	
Organisation (if applicable)	N/A	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

Please ensure receipt by Stafford Borough Council **by 12.00 noon Tuesday 21 April 2020.**

Please note:

- Comments must be received by 12noon on Tuesday 21 April 2020. Late comments will be considered "not duly made" under the Regulations;
- Please fill in a separate Part B for each question/paragraph/table/topic you are commenting on and, where necessary, please explain your response;
- Representations cannot be kept confidential and will be available for public scrutiny, including your name and/or organisation (if applicable). However, your contact details will not be published.

Stafford Borough Local Plan 2020–2040: Issues and Options Consultation Document.
February 2020

Section 4 Sustainability & Climate Change

The sites at Hixon Airfield [HIX07, HIX08] are designated by the Environment Agency as Flood Zone 1. However, I suggest that it is not acceptable because it is not in accordance with the following criteria in **Spatial Principle 7 (SP7) – Supporting the Location of New Development** for defining Settlement Boundaries:

j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas
The site is still susceptible to surface water and groundwater flood risks, as well as being adjacent to Flood Zones 2 and 3.

Likewise, the same reason means these sites also fail to meet the following criteria in **Ministry of Housing, Communities & Local Government Garden Communities August 2018** for Garden Communities:

j. Future proofed...designed to be resilient places...[to] impacts of climate change including flood risk and water availability

In addition, **Cannock Chase SAC. Guidance to Mitigate the Impact of New Residential Development. February 2020** acknowledges that the site at Weston [WES01], to which this development is linked for its viability, lies within a floodplain.

JBA Consulting. Southern Staffordshire Councils Level 1 Strategic Flood Risk Assessment – Final Report . August 2019, Appendix A: C3 Stafford Borough East - Stafford, Colwich, Weston and Hixon & Appendix C: Flood Alert and Flood Warnings highlights the amount of water that permeates the area in which the above-mentioned proposed development sites are located.

The susceptibility to groundwater flooding is as follows:

- From the main runway to New Road = 25%-50%

while adjacent areas in decreasing level of severity:

- 50%-75%:
 - To the north, from the main runway, crossing the A518, to Amernton Farm
 - To the south, from New Road to Pasturefields Lane
 - To the west, from the airfield to the A518
 - To the south-west at Shirleywich
- 25%-50%:
 - To the north-east, from the A518, through the village of Stowe-by-Chartley to Stowefields
 - To the north-west, from the airfield, crossing the A51 to the south of Gayton
- up to 25%:
 - To the east, along Stowe Lane between the village of Stowe-by-Chartley & the northern part of Hixon to Greenfields

as well as the risk in surrounding areas:

25%-75% moving from the north round to the west and the south

25%-50% to the east

The susceptibility to surface water flooding is as follows:*

- high risk of 3.3% from Station Road along upper part of Bridge Lane running down to airfield
- all risk levels of 3.3%, 1%, and 0.1% from airfield running down towards both Amernton and the A51

*Risk of Flooding from Surface Water (RoFfSW): It assesses flooding scenarios as a result of rainfall with a 3.3%, 1%, and 0.1% chance of occurring each year.

Flood zone areas are as follows:

- Flood Zone 1: former airfield

but adjacent to:

- Flood Zone 2:
 - from land immediately behind residences on Station Road, across upper part of Bridge Lane, down to airfield
 - part of airfield nearest mainline railway
- Flood Zone 3a (indicative 3b):
 - up to and across mainline railway to the A51
 - up to and across the A518 to Amerton and then Weston

Furthermore, the following are adjacent Flood Alert Areas:

- Amerton and Weston (crossing the A518)
- Shirleywich (crossing mainline railway and the A51)

due to being low-lying land and roads that surround the River Trent (Flood Alert Code: 033WAF310; Flood Alert Name: Stone Trent)

In addition, as Weston lies in proximity to the River Trent, it is located within a Flood Warning Area as well (Flood Warning Code: 033FWF3TRENT08; Flood Warning Name: River Trent at Enson, Salt, and Weston).

In addition, **JBA Consulting. Southern Staffordshire Councils Level 1 Strategic Flood Risk Assessment – Final Report . August 2019, Appendix D4: Summary of flood risk in Stafford Borough** points out specific flood risks in the area.

Hixon:

- a small unnamed drain, culverted in part, flows through the west of the village and is a potential fluvial flood risk
- surface water flooding:
 - occurs around the airfield industrial estate
 - forms an overland flow path, which is likely to become more prominent, from the unnamed drain to the east of Church Lane towards another unnamed drain south-west of the village
 - occurs in fields to the west of Sycamore Drive and the school
- the village is significantly susceptible to groundwater flooding: up to 50%, and 75% and over
- there is a history of some properties suffering sewer flooding

Weston:

- potential fluvial flood risk posed:
 - east of the Trent & Mersey Canal
 - on the left bank of the River Trent
 - at the unnamed drain and from Gayton Brook flowing past the north of the village
- Flood Zone 3 encompasses:
 - the church
 - properties on Boat Lane
 - the A518
 - Green Lane
- Flood Zone 2 extends further than Flood Zone 3
- Surface water flooding:
 - forms a minor flow path along Green Road
 - forms a more prominent flow path along Old School Road

- forms most prominent flow path along Old School and Ferrers Roads
- 2010 surface water planning map (SWMP) named Weston as being at high risk
- the village is significantly susceptible to groundwater flooding: 50%-75%, and 75% and over

In terms of each of the proposed development sites, which are interdependent for their viability, *Appendix C* of the 2019 *Strategic Flood Risk Assessment*, indicated:

:

- *WES01 – A518 Weston:*
 - 100% of the site lies within a flood zone, 99% of which is Flood Zone 3
 - the site lies within 100m of a detailed river network and is at risk of surface water flooding
- *HIX07 & HIX08 – former airfield:*
 - parts of the sites lie within Flood Zones 2 and 3
 - the sites lie within 100m of a detailed river network and are at risk of surface water flooding

The main report for the 2019 *Strategic Flood Risk Assessment* raises additional issues that should be taken into account:

- A blockage of the culvert on or a breach of the Trent & Mersey Canal in Weston leads to interaction with other watercourses and the forming of flow paths during flood events, the most recent occurring in 2013.
- Intense rainfall or river flooding causes sewer flooding in Hixon, because sewer capacity is overloaded and/or sewers cannot discharge to watercourses due to the high water levels, groundwater leaks into sewer pipes, and urban creep or incremental increases in paved surfaces add to the surface water discharge in the catchment area.

However, the Environment Agency's "Flood Map for Planning" refers to the probability of river and sea flooding, and Flood Zones do not take into account surface water, sewer surcharge, or groundwater flooding, nor climate change, and do not cover all catchments or ordinary watercourses; therefore, other flood risks exist and the level of flood risk will change over time, even during a development. In fact, surface water is one of the two main sources of flooding and originates from not only direct run-off from adjacent land but also surcharging of piped drainage systems.

Thus, although an area, such as Hixon Airfield, lies in Flood Zone 1, there may be a flood risk from smaller watercourses, such as Amerton Brook. Furthermore, those catchment areas outside the detailed model coverage are categorised as Flood Zone 3a (indicative 3b) as a conservative indication, such as the area adjacent to the former airfield to the west and southwest, meaning that a detailed site-specific flood risk assessment is essential to define the extent of that Flood Zone.

The 2019 *Strategic Flood Risk Assessment* is Level 1, but *Planning Practice Guidance* stipulates the following:

- A Strategic Flood Risk Assessment (SFRA) Level 2 is required where land outside Flood Zones 2 and 3 cannot appropriately accommodate all necessary development, and should consider the detailed nature of the flood characteristics within a Flood Zone as well as other sources of flooding.
- A Sequential Test is required in Flood Zone 1 where there are other flooding issues in the area of the development (i.e. surface water, groundwater, and sewer flooding).
- A full site-specific Flood Risk Assessment should be completed:
 - in Flood Zone 1 where proposals for new developments are of 1 hectare or greater (i.e. Hixon Airfield)

- in Flood Zones 2 and 3 for all proposed new developments (i.e. Weston and Hixon Airfield)
- where the proposed development or change of use to a more vulnerable class may be subject to other sources of flooding (i.e. Weston and Hixon Airfield)
- where the site comprises either 10 or more houses or is greater than 0.5 hectares and residential (i.e. a major residential development) (i.e. Weston and Hixon Airfield)
- where the site comprises at least 0.1 hectares of commercial development (i.e. a major commercial development) (i.e. Weston and Hixon Airfield)
- where the site is within 5m of an ordinary watercourse (i.e. Weston and Hixon Airfield)
- where the site is within 20m of a known flooding hotspot
- where the site is within the 1 in 30-year or 1 in 100-year flood extent based on the Risk of Flooding from Surface Water Map (i.e. Weston).

Natural England. National Character Area Profile: 68. Needwood & South Derbyshire Claylands. 2012 has also stated that tributary watercourses connected to floodplains – such as Amerton Brook and the adjacent flood zones and alert areas – allow for more flood storage capacity.

Finally, a **Speech by Sir James Bevan KCMG, Chief Executive, Environment Agency, CIWEM Surface Water Management Conference, 17 October 2018** stressed that floods are a real and growing threat to life, property, the economy, and the country. Moreover, surface water flooding constitutes a higher threat, because of its reach and impact on not only homes and businesses but also infrastructure, including roads, railways, and utilities. This is of serious concern in relation to the area of the proposed development, especially as the CEO continued to explain that development means more concrete, which means fewer places for rainwater to drain safely away, and the more frequent and intense the rainfall that climate change is bringing will make flash flooding and overloading of the sewer network more likely and more frequent. Thus, the requirement to constantly build more houses and the extreme rainfall brought about by inevitable climate change will increase the risk of surface water flooding.

MS L WELCH EMAIL RESPONSE – 21 APRIL 2020

From: Lucy Welch [REDACTED]
 Sent: 21 April 2020 11:01
 To: List-ForwardPlanning-SBC
 Cc: Tom Bullock
 Subject: Issues and Options Consultation Survey #5651111

Hi Stafford Forward Planning team

Please take the following email as my response to the consultation on the new local plan, which has the deadline of today at 12pm. I had, really frustratingly, completed much of your e-consultation form, before realising all the time and effort I had put in had been lost due to the form cancelling/timing out. Please see my suggestion relating to this at the end of the form as I am sure it catches lots of people out, who are then disheartened enough to give up and not communicate their views.

My responses are mainly in relation to the particular area(s) where development should be focussed. While I completely admit that I am not knowledgeable on many of the proposed garden community locations, I live near the proposed 'Meecebrook' development (5.34 v. in table). I think the below comments can most clearly be a response to Q5.F - reasons to avoid Meecebrook (garden community) as a development area:

- While the MOD site is, on the surface, a 'brownfield' site, the reality of the site is really quite different (it's very green and diverse), and I think would be entirely unsuitable for development for several reasons.
- Firstly, there has been extensive nuclear testing and munitions activity on the site, with a hefty amount of ground contamination as a result.
- Secondly, this site is an incredibly species-rich and diverse habitat for plants and animals; a pocket of land where they are able to thrive. Whilst developing this into an 11,500 house community may fulfil certain council objectives, it is incredibly questionable to say that this is a sustainable and green option.
- If this area is no longer required by the MOD, I suggest investigating alternative uses of the land, such as recreational space to have positive impacts on mental health and wellbeing.

A number of the other comments I had entered on the form related to suggesting where developing *should* be focused in the local plan:

- I suggest that the vast majority of the housing developments are focused on areas around our centres of Stafford, Stone and to some extent, Eccleshall. This is because it is paramount to protect the existing businesses operating in these areas - and create a diverse mix of chain and independent local businesses. While creating new garden communities would create new hubs for key services, it would do nothing to help the ones we already have, and I can imagine our high streets would become much more dilapidated as a result, as would the inner-city communities nearby.
- If the plan must consider and include new garden communities in addition to extending developments around our centres, then I suggest that these garden communities should be a number of small clusters (e.g. several hundred

houses) - not one significant cluster in only one area. This would ease the impact on all existing local residents and communities whilst ultimately fulfilling the requirement for more housing.

Suggestions for your e-consultation form itself to encourage more Stafford BC residents to contribute views:

- Please could you add 'save' buttons throughout the form, to enable users to do this without needing to scroll through the huge number of questions to reach the one and only 'save' option at the top?
- Please tell us how long it is until the form times out - 10/20/30 mins?
- Is there a way to extend this time out time?
- **Most notably, create a short form option:** the sheer number of questions and length of the full consultation response form is enough to put a significant number of people off completing it - people who are incredibly knowledgeable or passionate about a particular area, but not au fait with every element of it. I suggest this form could be a box to enter the question you would like to respond to (e.g. dropdown options), and then one or two free text boxes where the response can then be given. This would still enable you to cross-reference the questions to your main consultation form, but create a wider diversity of respondents who are intimidated by the main form.

I would be very grateful if my comments can be factored into the New Local Plan consultation, and if your form can be improved considering the above comments.

Thank you

Lucy Welch

**Response to Stafford Borough Council Consultation document for New
Local Plan 2020 to 2040 Issues and options February 2020**

Pat Tweed

Sustainability and Climate Change

4. Aa) Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations?

Yes

4. B) Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?

Solar panels to housing and public buildings wherever suitable. Ground and air heat source pumps especially large buildings. On shore wind for industrial developments wherever suitable. away from housing.

205 of 3750

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

Yes

4. D) Should the council allocate sites for wind energy developments in the Local Plan?

Yes, as 4B

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

Yes

The Development Strategy

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?

Yes, especially in relation to detailed planning approvals.

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?

Suggest the discount is based on approvals rather than land offered for building.

81 of 3750

5. Di) Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?

Yes

Please explain why you think this:

It reduces the need for travel from more rural areas, as employment will always be greater in urban areas.

5. Dii) Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

Yes

5. E) The northern built up areas of the Borough are not properly recognised in the currently adopted Plan. Should these areas be identified in the new Settlement Hierarchy?

Yes

Housing

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

Yes

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

Yes

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?

A range of thresholds

Why do you think this?

It would better match the nature of local areas and provide more accommodation in urban areas closer to transport.

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

Yes

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?

Yes

:8. Ea) In the new Local Plan should the Council apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings?

Yes

8. Eb) Only apply the Nationally Described Space Standards to new build dwellings?

No

8. Ec) Not apply the Nationally Described Space Standards to any development? No

Please explain your reasoning for the answers given above:

Adequate space is a necessity for a healthy life, it supports better physical and mental health.

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?

No

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?

Villages tend to have a large number of 4+ bedroom houses on new developments and too few bungalows if any.

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

Yes

Please explain why you think this:

The population is ageing and more disabled people could live independently. Wider doors and level floors, ramps etc also enable the easier use of mobility aids.

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

Yes

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

Yes, preferably the latter

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

No bungalows for elderly or disabled use should have only one bedroom. There needs to be space for family support.

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

Yes

Please explain why you think this:

It only needs political will.

29 of 3750

8. Kb) When 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? NO

Please explain why you think this:

Developers will always seek to lower the proportion of affordable housing.

74 of 3750

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?

No

8. M) To help maintain the supply of land for rural affordable housing should the Council, where development hasn't started, convert existing Rural Exceptions to Rural Affordable Housing Allocations?

Yes

8. Na) 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 build homes?

Yes

8. Nb) Should the council allocate plots for the purpose of self-build throughout the borough?

No

8. Oa) Do you consider that the approach detailed above will be beneficial to the smaller settlements of the Borough of Stafford and their residents?

Yes

Health and Wellbeing

11. Aa) Should the New Local Plan 2020 - 2040 continue to address health and well-being via relevant associated policies in the way currently adopted plan does?

No

11. Ab) Or should an alternative approach to the integration of health and well-being issues into the New Local Plan be adopted?

Yes

11. Ac) Where should references to Health and Wellbeing be strengthened in the New Local Plan? Don't know

0 of 3750

11. B) If at Question 11. ab you considered that the Council should adopt an alternative approach to the integration into the New Local Plan, which model listed in Para 11.10 would you advocate?

A

Please explain why you think this:

It recognises that health and well-being is not an add-on, but a basic underpinning of a healthy society.

Connections

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:

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	
First Name	Tony	
Surname	Bonser	
E-mail address	[REDACTED]	
Job title (if applicable)		
Organisation (if applicable)	[REDACTED]	
Address	[REDACTED]	
Postcode		
Telephone Number	[REDACTED]	

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

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

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

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

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

Please note:

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

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

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name T Bonser		Organisation		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	All	Paragraph		Table
Figure		Question		Other
2. Please set out your comments below				
<p>General Comment On Overall Plan</p> <p>The Coronavirus pandemic of spring 2020 will have a significant effect on society, the national economy and business operations for the period of the plan. This will in turn significantly affect the development needs for the Borough. My overall view is that the plan is too heavily focussed on economic growth at a time when relentless economic growth is being increasingly seen as unsustainable.</p> <p>I suggest an emphasis on stability, consolidation and true sustainability would be wise.</p>				

Part B: Your Comments				
<i>Please complete a new Part B for each representation you wish to make.</i>				
Name		Organisation		
2. 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.B	Other
2. Please set out your comments below				
<p>Question 4.B</p> <p>Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?</p> <ul style="list-style-type: none"> • Integrated rooftop photovoltaic panels on new build developments. • There should be a presumption in favour of utilisation of existing sites where the installation of water powered generation is viable within the context of any local historical or landscape constraints. Support and encouragement should be offered to the owners of these sites. 				

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.C	Other	
2. Please set out your comments below					
<p>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?</p> <ul style="list-style-type: none"> • Yes 					

Please use a continuation sheet if necessary

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	4	Paragraph		Table	
Figure		Question	4D	Other	
2. Please set out your comments below					
<p>Question 4.D Should the council allocate sites for wind energy developments in the Local Plan? If so, where should they be located?</p> <ul style="list-style-type: none"> • No 					

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.B	Other	
2. Please set out your comments below					
<p>Question 5.B</p> <p>a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough’s future housing growth requirements?</p> <p>What is your reasoning for this answer?</p> <p>I believe scenario D is most appropriate. The Coronavirus pandemic in spring 2020 will inevitably significantly reduce economic and housing growth needs in the period 2020 to 2040. Projections and scenarios will need to be revisited</p> <p>b) Should a Partial Catch Up rate allowance</p> <p>No</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	5	Paragraph		Table	
Figure		Question	5.F	Other	
2. Please set out your comments below					
<p>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> <p>I consider Intensification of Town and District Centres the best option. With the rise of online shopping and the demise of traditional high street retail the option of redeveloping parts of Stafford town centre for residential use has become attractive.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	6	Paragraph		Table	
Figure		Question	6.B	Other	
2. Please set out your comments below					
<p>Question 6.G a) Do you consider that a lack of suitable office space is a potential barrier to inward investment within the Borough?</p> <p>No</p> <p>The Coronavirus pandemic in spring 2020 will lead to greater adoption of home working etc and reduce the need for office space overall in the period 2020 to 2040. There is, and has regularly been for 15 years, a substantial amount of vacant space in locations such as Staffordshire Technology Park.</p> <p>Conversely in the wake of the pandemic there will be a trend away from globalisation and the need for local manufacturing, reversing the recent trend. I suggest that the plan should encourage manufacturing businesses particularly in the light industrial, electrical, electronic and technology sectors.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
3. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	8	Paragraph		Table	
Figure		Question	8.A	Other	
2. Please set out your comments below					
<p>Question 8.A Should the council continue to encourage the development of brownfield land over greenfield land?</p> <p>Yes</p>					

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	9	Paragraph		Table	
Figure		Question	9.C	Other	
2. Please set out your comments below					
<p>Question 9.C Should the new Local Plan:</p> <p>a) Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate;</p> <p>b) Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement;</p> <p>c) Require, through policy, increased long term monitoring of biodiversity mitigation and enhancement measures on development sites</p> <p>Yes to a) b) and c).</p>					

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	9	Paragraph		Table	
Figure		Question	9.E	Other	
2. Please set out your comments below					
<p>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?</p> <p>I believe tree cover is a very important contributor to the Borough on a number of levels.</p> <p>Policies should be strengthened to protect existing tress and woodlands, including extending buffer zones to take account of potential trees that may grow in the woodland as well as existing trees. In other words, think of the woodland for the long term and how development will interact with it.</p> <p>Support to owners of trees should be increased including of help, advice and grants to plant and maintain trees.</p>					

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

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

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

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

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

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

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

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

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

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

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

MR A ELLIOTT & C HOLTE EMAIL RESPONSE – 21 APRIL 2020

From: Alan Elliott [REDACTED]
Sent: 21 April 2020 23:52
To: forwardplanningconsultations
Subject: Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document February 2020.

To Council

Ref: Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document February 2020.

I do not support any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood Plan. The suggested garden village would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area for ever. The SHELAA 2018 document Ref HIX07 incorrectly designates the garden village site as a "Recognised Industrial Estate in the Local Plan." This is untrue and misleading; it is agricultural land not brownfield and is outside the industrial estate boundary.

I also bring it to the attention that provision was made for ground nesting birds on Hixon airfield site and there is much photographic evidence that it is being used by such birds. The Hixon airfield is also abundant with many other species of birds and wildlife. This proposed plan will destroy this wildlife.

It seems that the proposal is to join Hixon, Stowe By Chartley and Weston by adjoining this massive housing plan. I like the majority want to keep our own identity. We chose to live away from built up sprawling housing and the Town because we like to.

Why are council's hell bent on building on green field/agricultural land when you destroy town centres by building out of town shopping areas.

Why not create vibrant central town centre housing development combining retail and living. This would be more central to transportation links and will decrease the pollution on the environment. It will also attract the young who are in most need for housing.

I also bring into question the effects of increased vehicle traffic on the village of Stowe By Chartley, Hixon and surrounding area should the housing go ahead. Any road widening plan would require some house demolition for it to be effective.

I really hope that you listen to the people in the area's effected by this plan, because the majority do not want this to go ahead.

Alan Elliott & Carol Holte

Response to your Local Planning Consultation

Geoffrey White

This response has a component to all of these questions I think

Q's 1, 3, 17, 26, 27, 28, and 31

Many planners were inspired to enter the Planning profession by the work of Ebenezer Howard and his contemporaries but have been disappointed by the actuality of Gov diktat to achieve what Gov thinks is best, and have found curtailment to their imagination.

The early thinking for garden towns (cities) I remember included for green wedges to radiate from(or to) the nominal town centre, something that Stafford already has in its river and canal topography. I rather think that doesn't currently enter into the thinking of the LA because of the detrimental current effects on the Sow and Penk washlands and the winding canal lands I see so regularly from Tixall Rd and Baswich Lane. Their wedge loveliness is being chipped away now through LA thoughtlessness. There has been/is no thought of the effect on vistas, e.g. 1/ the horribly effect of the new housing estate (at Tixall Rd) to the vista from the canal bank, 2/ the blocking of the view of the washlands from Baswich Lane nth bound at the bridge over the canal by retail buildings there. In general it seems planning permissions considerations do not include a walk through the site and the greater area, all thinking being done in the office looking at the 2-dim in plan and neglecting the 3rd-dim, whether or not it is drawings or digital imaging. It should be regarded as essential that the 3rd-dim is utilised.

Q7

Please be open to innovative approaches to housing, so that durability, passive gain by sth facing the building, well insulated, and active energy gain.

Q16

Provide facilities for traditional games and sports spaces/grounds locally and for the community and not private facilities.

Q21

Separate the transport modes for safety, cycling from vehicles, and walking from cyclists. Take seriously the provision of park and ride for commuters office staff mostly. Our town has too much traffic and is spoilt by the volume and its consequences.

Q25

A big yes to this.....look to Italy for its exempla town new and traditional housing and architecture. And where an existing build has merit, to reuse it and convert rather than demolish and build inferior.

Q30

Keep an open mind. These technologies are not at an apex and are evolving, e.g. provision of hydrogen for fuel cells, energy storage other than battery banks.....etc

MR N BAXTER EMAIL RESPONSE – 21 APRIL 2020

From: Baxter Nigel [REDACTED]
Sent: 21 April 2020 11:59
To: List-ForwardPlanning-SBC
Subject: Stafford Local Plan Review 2020 to 2040

Stafford Local Plan Review 2020 to 2040

I do not support any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood Plan. The current Stafford local plan should remain in place until its original date of 2031. Both the HNP and the Stafford Local Plan were only adopted in the last few years so it is absurd to say they should be radically overturned by some of the proposals in this review.

Of particular concern is the proposed garden village that would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area for ever. This is easily evidenced by the fact that Hixon currently has about 850 houses, and this proposal alone would add nearly 2000 extra properties. Furthermore, the SHELAA 2018 document Ref HIX07 incorrectly designates the garden village site as a “Recognised Industrial Estate in the Local Plan.” This is untrue and misleading; it is agricultural land not brownfield and is outside the industrial estate boundary. In addition just in case this is not enough another eight sites are suggested adding a further 400 houses, which alone is four times the current HNP target that was only agreed in 2017, and was to be in place until 2031.

Therefore, I have no alternative to object strongly to the proposals put forward that would adversely affect the villages of Hixon, Stowe -by- Chartley and Weston.

Regards,

Nigel Baxter

MRS C GILL EMAIL RESPONSE – 21 APRIL 2020

From: Catherine Gill [REDACTED]
Sent: 21 April 2020 11:57
To: forwardplanningconsultations
Subject: Stafford Borough Local Plan 2020-2040 Issues and Options Consultation Document
February 2020

Hello

I do not support any of the proposals for development of either housing or employment land on sites that are outside the Hixon residential settlement boundary and recognised industrial estate boundaries as defined in the adopted Hixon Neighbourhood Plan.

The suggested garden village would dwarf both Hixon and Stowe-by-Chartley and would adversely affect the character of the area for ever.

The SHELAA 2018 document Ref HIX07 incorrectly designates the garden village site as a "Recognised Industrial Estate in the Local Plan." This is untrue and misleading; it is agricultural land and outside the industrial estate boundary - this calls into question the legitimacy of the proposal.

The boundaries of the Hixon industrial estate in the Hixon Neighbourhood Plan and the Plan for Stafford have repeatedly been breached by temporary planning permissions - this is not justifiable and must stop
Additional housing in Hixon CANNOT be justified by the false claims that there is employment in Hixon - and vice-versa - as it has been proven time after time that the vast majority of Hixon residents leave Hixon, by car, to work outside of Hixon as the types of employment in Hixon are not suitable for them. And the vast majority of people working on the industrial estates in Hixon drive in to work by car from outside of Hixon, causing huge traffic problems and queues.

Many Hixon residents are educated to 1st degree level and above and need higher level/management types of employment.

Regards

Catherine Gill (Mrs)

I would like to comment on your new Stafford Local Plan, even though I am not sure how a twenty year plan can go ahead to the original timetable as it was based on evidence which collected before the current pandemic affected everything so comprehensively. I am going to state my thoughts on the Local Plan in so far as it may affect me and in a way I consider to be valid. I know I therefore risk my comments being disregarded as they possibly do not fit into the strictures of Material Planning Considerations; I also realise I may be regarded as a 'nimby' but I do not feel in a position to speak for areas I do not live in or have any connection with (unlike consultants), and if people are not prepared to speak up in defence of their own villages we may as well give up now.

I am not replying to the specific questions in the Issues and Options Consultations document because I am not a planner, a supplier of utilities or a representative of any official organisation and therefore do not have the technical knowledge required for a large proportion of them. I simply live in the village of Hixon which is possibly going to be the community most profoundly affected by this plan.

Referring to the proposal of garden communities, specifically E- The Hixon Airfield and, to a lesser extent, F- Weston, I would like to say that I have no idea how either of these fit into the Key Objective 21, 'Provide for high quality new small scale housing development at appropriate villages that reflect their distinct local character'. When a new development is suggested for the village usually there are concerns it will be difficult to assimilate it into the village or that it will put more strain on our existing infrastructure or amenities, not that it will totally eclipse the existing settlement. The requirements and mitigations expected from previous developers have not always been honoured and I see no reason to think anything will change in the future apart from the magnitude of their promises. Besides, I have never seen any developer promise to keep the integrity of the most affected communities; it is always a damage limitation exercise or a sweetener. As our Neighbourhood Plan will also disappear we will be unable to express our wishes in a timely fashion. I do not expect the village to be preserved in aspic; it has to grow to stay alive but I do expect some vestige of the original character to be left and in this case I mean Hixon should remain a rural village and not turn into semi urban sprawl. In spite of the fact that it is already considered to be urban in your plans (Table 5.7 Hixon Typology Urban Extension), the government definition of rural is a settlement of less than 10,000 residents (Gov.uk Rural Urban Classification) which would include Hixon at the moment. I chose to live in a village deliberately as I prefer village life and I do not require lots of amenities. When I do require facilities I go to Stafford; I did not expect or want Stafford to come to me, but as the only extra amenity mentioned in the plan is a railway station whose existence is dependent on building a second garden community, it seems we will have all the disadvantages of a larger community with none of the advantages. (As the nearest station in Stafford is apparently within 1200m-AECOM Stafford Borough Strategic Development Site Options- a station seems an odd choice of amenity) I wonder how a Stafford resident would feel if the town suddenly shrunk to a quarter of its present size with a consequent proportional loss of conveniences.

In the AECOM report the land at Hixon is described as low value and low susceptibility to development. I take it this is official jargon for not many people will mind and the ones that do mind don't matter. I would speculate this is because the authors, and possibly the council, have no connection to the place and consequently no love for it. They have not walked over its footpaths in good times and bad and seen the changing seasons and the wildlife that lives on it. They have not imagined the lives of the airmen who fought on and for this bit of land. If the airfield does not look

as atmospheric as it did twenty years ago I would suggest that it is not the fault of the villagers but the owners of the land and the council and why should that mean we are to be deprived of what is left? There are thousands of pieces of land in this condition across the country and if they are to be picked off because they are not picturesque enough it will make sustainability a joke. The wildlife in the area may not be the most endangered currently, although there are skylarks, but it won't be long before it is if this type of policy is pursued.

There are also several impediments to building on this land, namely risk of flooding, a high pressure gas pipeline, and possible previous contamination of the land. Additionally two country lanes, Stowe Lane and Bridge Lane would have to have their character obliterated by widening and straightening. This would undo all the efforts of the village to stop vehicles cutting across from the A51 at Farley Corner to the A518 at Amerton. (There is some merit in still having 'a rolling English road'. It slows down and limits the traffic.) Additionally a road is proposed to be built to the west of the site which would not only require purchasing more land but crossing the West Coast Main Line. The last time this was done it cost two million pounds (2002). This would also contradict the idea of the site having a high level of potential containment as one of the barriers, and arguably the most robust, would be breached initially and as a consequence of the development. Another material consideration would be the estimated 12 million pounds required to upgrade utilities in the area. (AECOM page132)

The land in question is not, as is stated in the plan, unused. It is used for agriculture and the runway was taken up to provide land for ground nesting birds as per planning application 14/19873/COU. As I understand it, the land is not within the recognised industrial estate boundary it is outside it, as stated in the Hixon Neighbourhood Plan. Even if this becomes defunct with the old Stafford plan its intentions do not.

Although the land itself is not considered to be of much merit in any category measurable in either the new plan or the report (AECOM), there is some concern the development may impact on the view from Chartley Castle, Grange Farm Amerton, St Johns Church Stowe, Inglenook Cottage Stowe and Wychdon Lodge and outbuildings Hixon but that the impact can be 'mitigated by appropriate design'. This suggests planting a few trees and pretending it is not there when the most effective mitigation would be if it wasn't there.

It is now even more difficult to ascertain exactly how many houses need to be built in the area as the PCU was based an assumption of coming out of recession which seems increasingly unlikely and therefore the total residual need of between 3672 and 8915 over the plan period 2022-2040 might need revising downwards. (Sustainability Appraisal of the New Stafford Borough Local Plan 5.9) This makes Option Three (Disperse growth across the settlement hierarchy) a viable and preferable solution, with the proviso that Key Service Villages that have already 'received a disproportionate amount of housing', (Issues and Options 5.16 and table 5.3) i.e. Hixon, should not be targeted in the future. Indeed your own literature says 'The appraisal shows Option 3(low) to perform well in respect of the greatest number of objectives, and also to result in significant positive effects in respect of the greatest number of objectives.' Furthermore, if the global situation should prove to be less dire than it appears at the moment then, as the garden community at Meecebrook is already included as an ongoing concern in government documents unlike the other potential sites (Garden Communities gov.uk), its forecast of providing 11,500 new homes would account for a large

proportion of the required housing. This would suggest to a novice like me that it is slightly more likely to happen than the other sites but maybe it has more to do with securing funding than actually starting the project.

In conclusion, to make my view absolutely clear and because I subscribe to the opinion that only two alternatives are possible, not three or six I would say the choice is between having a garden community on the airfield or not. Looking at the evidence I would choose not to.

Referring to more general matters there are two things I have noticed about Stafford town centre. The first is the amount of empty shops in the main street, particularly towards the north end (Gaugate Street) and the loss of the Shire Hall as a museum and arts centre. I think the proposal to use the Shire Hall as a mixed use centre including housing is part of the problem. Stafford has lost its USP and therefore has no coherent centre. Staffordshire used to be called the creative county and, while I don't think that simply putting this on a road sign, as has been done in the past, will make it happen, developing Stafford as a cultural centre could make it a more attractive place for business and attract more small businesses into the centre. The loss of the exhibition space in the heart of the town where it was arguably more accessible to a larger number of people is a travesty and I have seen no evidence of any 'realignment of arts provision', just an empty building that had never before been closed in its 219 years of existence. I would be ashamed to say that had happened on my watch. As I am not a professional in this area the financial implications are not something I can comment on but other places manage to do it. The cancellation of Stafford's Litfest is very unfortunate, if inevitable, but it is telling that I only realised it was happening when researching these comments.

In short, Stafford town centre needs regeneration but in a way that is thoughtful and sensitive to the area, not just in a mixed use, one size fits all, let's put anything in there that makes a profit kind of way. It requires effort, meaningful planning and proper consultation with Staffordshire people not just lots of almost incomprehensible charts, diagrams and questions we can't possibly answer.

**Response to consultation on Issues and Options for Local Plan
April 2020**

K Davies,



Reference <https://www.staffordbc.gov.uk/forward-planning-consultations>

Please find comments on the sections as follows:

Section 1.3

This section refers to the requirement for a '5 year assessment of whether the Local Plan effectively addresses the needs of the local community'.

The over-riding focus on 'growth' and development is not a reflection of the true needs of the 'local community'.

Will it be 'local' Stafford people living in these houses?

Does the local Stafford community wish to see large scale building on green field sites, farmland and flood risk sites?

Does the local community benefit as congestion increases with large scale house building and associated car based travel?

Section 1.4

This section refers to an 'updated methodology for the calculation of local housing need'.

Again, where is the evidence that 'local' Stafford people will purchase these houses?

Section 1.10

In this section there is reference to renewables being 'alternative' energy sources. The phrase 'alternative energy' is archaic, a phrase common in the 1970's. Renewables are in most areas mainstream and not 'alternative'.

Question1

Panel 3 'Development of Housing'

There is no reference here to sustainability in design, this should be fundamental.

Panel 5

Bullet point 5 states 'local green spaces, AONB etc should be protected and conserved'.

To this should be added 'enhanced' or there will be several backward steps from previous Stafford Borough Council Strategies (Local Agenda 21 Strategy 2001 <https://desarrollosustentable2015.files.wordpress.com/2015/11/caracteristicas-de-una-ciudad-sustentable.pdf> and Stafford Borough's first Biodiversity Strategy 2000).

Section 1.9

In this section Table 1 'Studies commissioned to support Stafford Borough Local Plan 2020-2040' excludes any mention of studies in relation to existing and future Walking and Cycling infrastructure. There is an urgent need to improve the quality of existing walking and cycling infrastructure and a moral obligation to expand and enhance both walking and cycling routes through a true vision and commitment to sustainable travel (and the resultant contribution to more active healthy lifestyles plus environmental gains).

Section 1.15

A 'sustainability appraisal' may be undertaken but because of the flawed and loose meaning of the term 'sustainability' this is in essence an inaccurate and dangerous measure of the achievement of true sustainability or a measure of any progress at all towards a more sustainable Stafford Borough community.

Section 2.3

This section states that the population 'is expected to grow by around 8.5% between 2014 and 2034 leading to an increased demand on services and facilities, and the need to provide additional quality housing and employment opportunities'

There are however limits to growth!

For how long will growth be accommodated given the finite nature of resources (of all kinds) and existing pressures on infrastructure?

The Council has also recently declared a Climate Emergency and thus has made a commitment to Climate Change and Biodiversity – however the fanatical pursuit of growth and development which forms the basis of this Local Plan (and the NPPF) are mutually exclusive to these stated commitments to tackling Climate Change and protecting Biodiversity.

Section 3.1

This section on 'Vision and Strategic Objectives' mentions the Stafford Borough Council Corporate Business Plan 2018-21.

The third corporate business objective is

'To be a well-run, financially sustainable and ambitious organisation, responsive to the needs of our customers and communities and focussed on delivering our objectives'

So, an objective is to deliver the objectives?

Section 3.2

In this section it states 'This Vision, along with its associated Objectives, has strong links to the concept and delivery of Sustainable Development'.

Council understanding of Sustainable Development is not evident in either the

Corporate Business Plan or the draft Local Plan.

Refer back to the Council's own Local Agenda 21 Strategy (2001 <https://desarrollosustentable2015.files.wordpress.com/2015/11/caracteristicas-de-una-ciudad-sustentable.pdf>) which showed leadership, vision and clarity of understanding of the meaning of sustainable development.

Section 3.3

This states 'The Vision of the currently adopted Local Plan (2011-31) Vision is expressed as follows:'

This simply doesn't make sense.

Also under section 3.3,

Part L states:

By 2031 the County Town of Stafford will have 'increased educational attainment at all levels and retained high quality graduate skills delivered by further education facilities and bolstered by significant inward investment'

This is unclear in meaning and unconvincing in means of achievement.

Also under section 3.3,

The paragraph after 'x' states:

'The Borough will have a rich natural environment which is resilient to the effects of climate change, is well maintained and enhanced with more people enjoying the area through a greater sense of health and well being A high quality strategic network of accessible green space will have been developed in and around Stafford, Stone and other areas a.... facilitated by an improved road and public transport network

The whole paragraph is muddled and unconvincing.

The second paragraph after 'x' states:

'Area of Conservation (SAC), and the Green Belt areas within Stafford Borough will have benefited from a sustainable approach to strategic housing development. This approach will have been tailored to delivering accessible natural green-space for residents and workers, and will have maintained and enhanced the character of these important local resources' as well as their unique environmental qualities and openness'.

Presumably 'Area of Conservation' refers to 'Special Area of Conservation'?

This inaccuracy is compounded by a lack of clarity or understanding throughout this paragraph, which is muddled and unconvincing.

Section 3.8

Question 3. B

It states here 'In order to achieve this, the Vision should express and give support to a holistic strategy to enable the raft of inter-relating policies to address the significant climate change and social challenges whilst responding to the imperative for sustainable growth, a high quality environment, excellent design and the facilitation of innovative solutions.

The tortuous language used does little to disguise the fact that the aim to address 'significant' climate change and achieve the imperative for sustainable growth mutually exclusive and a fundamentally flawed. Need to define 'significant climate change',. Need to explain how this 'significant' is measured?)

The 'imperative for excellent design' is also dubious. Barrack style blocks which have recently been built along and off the Tixall Road are hideous. Given past, recent and current design is this design excellence likely to be the reality? I hope so.

Question 3 C

The need to respond to Climate Change and its consequences will be an impossibility with this 'business as usual' perpetual growth scenario. A real understanding of the term Climate Emergency is lacking and very worrying.

28 Key Objectives

Objective 3.

' Deliver mitigation measures against any significant adverse impacts on the Cannock Chase Special Area of Conservation'

There are already major adverse impacts on the SAC even before the proposed huge levels of growth begin to impact. Further significant damage is inevitable with the levels of growth/development and additional user numbers which will ensue.

Objective 4.

'Avoid development in flood risk areas'

This should read be amended to 'Do not allow development in flood risk areas'

It is inconceivable that the organisation can declare a Climate Emergency and then have a vague desire to 'avoid development in flood risk areas'.

Objective 5.

'Provide new high quality employment land between 2011 -2031 across a range of sites that mitigates against adverse impacts, made available for new research and development facilities as well as growth opportunities to provide new businesses for graduate employment and inward investment to diversify the economy'.

This paragraph is muddled and the meaning unclear.

There are tens of hectares of new employment land available, created through the sacrifice of productive farmland – finite land that will be ever more critical for future food production and broader environmental and social wellbeing services.

The rate of growth of employment land on greenfield sites is ultimately unsustainable and, as stewards of the land and in the context of an indisputable climate emergency, morally unjustified.

Objective 6.

'Enhance existing, and provision of significant, new green infrastructure and habitats in the area through green links, such as the canal, from the surrounding open countryside and the Cannock Chase Area of Outstanding Natural Beauty into the heart of Stafford to encourage healthy living for leisure time activities, whilst safeguarding and enhancing the landscape setting'.

Thus by funnelling additional numbers to Cannock Chase, inevitably increasing damage from higher visitor numbers. The landscape setting is unique, but other impacts from litter, dog fouling, significant erosion (multitudes of new mountain bike tracks cutting new routes across the AONB) disturbance of habitats etc).

'Cannock Chase is dying' are the opening words given by AONB officers when they deliver presentations.

A major, new, large scale county park is needed to divert already damaging pressure on Cannock Chase. This could help achieve biodiversity targets, tree strategy targets (when they are eventually set) and health and well being targets. Such a project could dovetail with other sustainability commitments and drive numerous aspects of a green economy, as well as links across all levels of the education sector.

In addition, added to this, there should be no more catastrophic damage to Doxey Marshes SSSI.

Objective 9.

'Provide new development at Stafford to encourage greater retention of high quality Further & Higher Education professionals in the area and up-skill educational attainments'

Query regarding the meaning of '...up-skill educational attainments'??

Additional Objectives:

I would suggest adding 'Provision of Quiet Lanes' in a new initiative across the Borough to promote walking, cycling and horse riding, supporting active lifestyles and taking pressure off the current very few congested cycling routes (ie The Stafford Newport Greenway').

This is a well established successful practice already instigated across many local authority areas.

Section 4. Sustainability and Climate Change

4.2 'Plan-making provides an opportunity to positively influence the future of a place through the provision of practical solutions and the facilitation of behaviour change to negate the implications of climate change. To achieve this it is important to recognise that a planning horizon of 50-100 years is required'.

A planning horizon of 50-100 years to 'provide practical solutions and facilitate behaviour change' is ludicrous.

Given there is no dedicated officer post responsible for sustainable development or climate change to drive the agenda forward the likelihood of progress is doubtful.

Section 4.5

'Local Plans provide many opportunities to help communities mitigate and adapt to the negative effects of climate change. This is highlighted in the "Rising to the Climate Crisis, A guide For Local Authorities on Planning for Climate Change" document, produced in collaboration between the Town and Country Planning Association and the Royal Town Planning Institute. This seeks to empower Local Planning Authorities to make the transition to a low-carbon future'.

Local Plans provide opportunities to help communities mitigate and adapt to climate change BUT they have had opportunities for many years to do just this. An aspiration around 2008 was for all new homes to be carbon neutral by 2016!

In truth there is a dearth of housing or other developments which incorporate even the simplest of sustainability features. Where are the housing developments with solar PV built in by design? Or the estates with integral natural greenspace, nesting boxes and retained hedges? Business as usual has always come out tops, how will this change?

'Enabling behaviour change. Increasing sustainability can also be achieved through making suitable provision for individuals to adapt their behaviour to lead more sustainable lives. Locating development in such a way that it reduces the need to travel by car to access services and facilities reduces carbon emissions. This can be achieved through increasing access to public transport, encouraging residents to make journeys on foot or by cycling as well as using innovative technologies such as electric vehicles and other forms of non polluting travel'.

Sustainability is far more than an intention to locate where there is access to public transport or a chance that people might travel by bike.

Sections 4.6, 4.7 and 4.8 all require resources, time and commitment to progress

Section 4.10

'Climate change can be mitigated in a variety of ways. Increasing energy efficiency within the built environment decreases the energy demand of an area, whilst reducing energy bills. Transitioning energy networks from fossil fuel to renewable energy sources reduces carbon emissions and eliminates the need for fuel exploration and extraction. Therefore, the necessity for activities such as fracking and coal mining is eliminated. Urban tree planting prevents the formation of heat island effects in urban areas, whilst simultaneously removing CO₂ from the surrounding environment'.

So, where is the Tree Planting Strategy and where will urban trees be planted on a significant scale?

Q 4A

- a) YES but is this likely to happen or will there be no appetite unless building regs change
- b) There are many – look at best practice elsewhere!

Q 4B Which renewable energy technologies

- a) The broad range of available tested technologies
- b) Gather evidence and seek appropriate sites – not possible for a layperson to make vague suggestions. Studies exist eg by Halcrow the 'Staffordshire Renewable Low Carbon Energy Study, 2010. Other studies are listed at <https://www.staffordbc.gov.uk/energy> though these are dated and perhaps other more up to date studies are available or have been commissioned.

Q 4C On site renewables on large developments

Yes of course if the Council is serious about a climate emergency.

Q 4D Allocate sites for windenergy

Yes, on technically appropriate sites but not in protected areas.

Q 4 ED Water Standards

Potentially, but without tougher Building Regs is this

SPATIAL PRINCIPLE 1 (SP1) - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

'When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants and communities jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area'

Q 5A a) Does SP1 meet requirements of NPPF?

It may meet them BUT this NPPF requirement is fundamentally flawed.

Sustainable development is much more than 'development that improves the economic, social and environmental conditions in the area'.

Real understanding of the term 'sustainable development' has been lost.

Real understanding of the imperative for 'social, economic and environmental well-being' is required in National and Local policy.

It is essential to return to the original definition of sustainable development –

'Development which meets the needs of current generations without compromising the ability of future generations to meet their own needs' as defined in 'Our Common Future', also known as the Brundtland Report (1987) and also which was adopted in Stafford Borough Council's own Local Agenda 21 Strategy for sustainable development (2001)

(<https://desarrollosustentable2015.files.wordpress.com/2015/11/caracteristicas-de-una-ciudad-sustentable.pdf>)

Sustainable Development is also fundamentally understood as 'development in which we don't cheat on our children'.

Q 5A b)

SP1 in this form should not be retained.

It should be reviewed and updated to fully recognise the threats we now face including the Climate Emergency and other key priorities relating to biodiversity, well-being and the need to support the development of a sustainable, future proofed economy, in essence a 'planet proofed' economy – which truly delivers 'social, economic and environmental well-being'.

Q 5B a)

The lowest figure should be used – Scenario D.

The huge numbers of new housing estates which have appeared over recent years have already changed the character of both Stafford and other smaller settlements including Eccleshall, Stone, Gnosall, and escalated pressure on infrastructure.

Swathes of new housing have been built on greenfield sites and farmland.

Many of these developments have been resisted by the local community for decades eg Castlefields, where up until now, local community campaigns have managed to save this edge of town countryside, which is valued deeply and keenly by the local and wider community, due to the special nature of the green space/farmland and for its wildlife/recreational value and unique setting around the Castle.

The emphasis on Growth and House Building of this kind and at these levels is unsustainable and has been driven by financial incentives through the New Homes Bonus, which the Council has received for exceeding its housing allocation under the current Local Plan. This New Homes Bonus has helped drive the current disproportionately high housing commitments, and amounts to £2.65m in 2018-19, and £3.3m in 2019-20.

Q 5B b) No, as above.

Q 5C

Yes, the discount should be applied for the full 6000 homes. The development levels in the current Local Plan are already excessive.

Green Belt

5.23 'Less than a quarter of the Borough's area is identified as Green Belt..' and

5.24 'Therefore, on the assumption that the Borough's development need for the Plan period can be accommodated on land not designated as Green Belt, the new Local Plan will not look at revising the Green Belt boundary, although NPPF21 does permit limited infilling in villages, limited affordable housing and limited infilling or the partial or complete redevelopment of previously developed land within the Green Belt'.

Land may not be designated as Green Belt. However it may otherwise be productive

farmland, essential food production land, valued countryside, provider of essential environmental services, including climate change services, have biodiversity value etc.

Thus the value of any greenfield site – a finite resource – should be made clear and development on such sites avoided.

Q 5G Garden City/Major Urban Expansion

A: Adoption of the minimum housing allocation or thereabouts will obviate the need for This scale of new development will not be required if the minimum housing allocation is adopted and a true desire for sustainable development and a sustainable Stafford Borough community is the goal.

A new Garden City in the context of Stafford Borough and its existing Settlement Hierarchy is simply unnecessary. There is no sense in building a new development which would draw people out of existing settlements and no doubt cause dis-benefits to existing centres - most particularly Stafford, which already suffers from town centre blight at the north end.

A new Garden City would almost certainly be car dependent, expensive and unlikely to serve the needs of the local community.

5.62

'Of the six growth options discussed above, which represent the possible reasonable alternatives for Stafford Borough three (Options 1, 2, and 4) could be considered contrary to NPPF. As such they are considered less appropriate and are proposed to be discarded'.

I agree, Options 1,2 and 4 are not possible reasonable options.

Q 5H

The ideology of continuous growth underpinning the NPPF and thus this Plan needs to be questioned.

Q 5I

No

Q 5J

None of these.

A new calculation of need and a proposal based on sustainability and the challenges of the climate change emergency is required.

6.2 'The NPPF acknowledges the importance of building a strong and competitive economy³⁶, and stipulates that planning policies should help to create the conditions in which businesses can invest and expand. Further to this, it also emphasises that focus should be placed on creating prosperous economies in both urban and rural areas'

And

6.3 Stafford Borough's central location and the excellent transport links serves to predispose Stafford as a desirable and attractive location for businesses from a range of sectors. However, to optimise the economic potential of Stafford Borough,

the Council must ensure the provision of a diverse portfolio of employment land and buildings'.

'Chasing the Growth Dragon' in this way is in complete contradiction to the Climate Change Emergency Declaration and simply places Stafford in competition with every other local authority area that is blindly Chasing the Same Dragon of unsustainable economic growth.

Q 6G a) No

There is plenty of empty office space in Stafford Town Centre and this should be utilised as part of a plan to help the town centre thrive again and if this is a goal then further creation of new out of town/town edge office space should be avoided.

Q 6G b) Town centres

6.18

Maintenance of existing economy is as important if not more important than eternal (impossible) growth.

Q 6L

Seek to make use of existing under used assets eg designate Quiet Lanes.

Q 8A Yes

Q 8B ii preferred to I

Q 9A a)Yes

Q 9A b) Yes – so long as it is actually additional.

Q 9B This should be an aspiration and an intention irrespective of new development and should not be dependent on new development.

However, yes any new development should be required to be accompanied by restoration and creation of habitat.

Q 9 C

a) Yes

b) Yes, so long as biologically important sites are not sought after for development to enable this thus resulting in sacrificial damage

c) Yes

Q 9D

Plan policies should enable the highest protection, conservation and enhancement of the AONB to ensure avoidance of any adverse impact.

Trees

9.18 states 'Trees are incredibly valuable components of both the urban and rural landscapes of an area, and provide wide reaching and multifunctional benefits for human and wildlife populations alike. Their widespread distribution can predispose them to being removed or damaged as a result of the development of an area. The prevention of this activity therefore requires careful consideration to ensure development remains to be sustainable'.

The last sentence is unintelligible.

A Tree Strategy is required with challenging targets, sufficient allocation of resources and a clear vision and commitment, and long term goals.

Q 9E

Establish excellent partnership working, set ambitious targets, link strongly to Climate Emergency and health and well-being benefits, work with experts.

The risk is that development will be looked upon as more benign simply by planting a few trees.

Historically developers have paid lip service to trees and the value of trees and it is essential that a new Tree Strategy becomes a priority with the resource required to ensure this commitment is real.

Targets required.

9.28

States 'Intensive farming generates a number of environmental problems, including impacts on soil health, air quality, river freshness, biodiversity and climate change. To address these growing problems and to ensure food supply we need to be an active member of the food revolution'.

'...we need to be an active member of the food revolution'.

This requires an explanation as standing alone it is a meaningless statement.

Q 9F

a) Yes

b) Not really – establishing projects on what are temporary sites will be a backward step. Setting up projects takes a lot of hard work. Letting them then be lost is demoralising, short termism, not sustainable!

c) Yes

d) Not sure what this means

Q 9I

1 Yes

2 Yes

3 Yes

4 Difficult to say, would need case by case analysis

5 Yes

Q 9L

- a) Yes
- b) Yes
- c) Yes

Q 9M Yes

Q 9f) Yes, ANGSt would be very valuable and should now be brought in

Q 10 A

- a) Yes
- b) Yes
- c) Yes
- d) Yes

Q 10 B Yes

Q 10 B Yes

Q 10 C Yes

Chapter 14

Policy N8 Landscape Character

No of planning applications refused on landscape character grounds.

This is a poor indicator as planning apps should not get to the submission stage/put forward in the first instance if they impact adversely on landscape character.