

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

**Statutory Bodies
and Stakeholders**

3 February - 21 April 2020

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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Mr	
First Name	Philip	
Surname	Sharpe	
E-mail address	[REDACTED]	
Job title (if applicable)	Chairman and Planning Officer	
Organisation (if applicable)	Inland Waterways Association, Lichfield Branch	
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 However, your contact details will not be published.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	3	Paragraph	3.9	Table	
Figure		Question	3.D	Other	Page 28
2. Please set out your comments below					
Key Objectives – Stafford					
<p>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</p> <p>This key objective clearly relates to the Stafford Riverway Link CIC project to restore the historic canal and river navigation from the Staffordshire & Worcestershire Canal at Baswich into Stafford town centre.</p> <p>Work is already underway on the first phase of this at Baswich Basin.</p> <p>The Inland Waterways Association welcomes this support for the project as a Key Objective for Stafford in the New Local Plan.</p> <p>Question 3.D</p> <p>Answer: Yes, the spatially-based approach to the objectives should be retained.</p>					

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

Please use a continuation sheet if necessary

- 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: Philip Sharpe		Organisation: Inland Waterways Association, Lichfield Branch			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	6	Paragraph		Table	Panel 6
Figure		Question	6.L a)	Other	
2. Please set out your comments below					
Panel 6					
Scoping the Issues Consultation – Transport and Communications Infrastructure					
<ul style="list-style-type: none"> • Suggestion that Canal Facilities and New Marinas policy is carried forward with amendments to enable residential moorings 					
6.L The Visitor Economy is considered by Policies E6 (“Tourism”) and E7 (“Canal Facilities and New Marinas”) in the currently Adopted Local Plan.					
a) Do these Policies continue to be sufficient in their current form or do they need adjustment? If so, how?					
Comments:					
The suggestion in Panel 6 above was made by the Inland Waterways Association (IWA) in response to the Scoping the Issues Report. IWA welcomes the recognition of this as an issue for consultation at the Issues & Options stage through question 6.L a).					
IWA expects that Policy E7 Canal Facilities and New Marinas, with its supporting text, will be carried forward into the New Local Plan.					
IWA is generally content with the provision this makes for canal related developments and facilities, but considers that the following condition should be removed from the policy:					
h. There are no permanent moorings for residential use.					
IWA’s Policy on Residential Boating is to encourage the inclusion of residential berths when new marinas or mooring sites are being developed.					
The Housing and Planning Act 2016 includes a duty for local housing authorities in England to “consider the needs of people residing in or resorting to their district with respect to the provision of ... places on inland waterways where houseboats can be moored.”					
IWA encourages local authorities to approve applications for residential moorings where such proposals meet the sustainability and environmental criteria in the Local Development Plan.					
For further information see:					
https://www.waterways.org.uk/information/policy_documents/residential_boating					

It is normal practice nowadays for canal boat marinas to include a proportion of residential berths. Not only does this provide for the increasing numbers of people choosing to live on canal boats, but their presence contributes greatly to the security of the whole site. If sufficient numbers of properly serviced berths are not provided in marinas or at other mooring locations through the planning system where they can be subject to appropriate controls, then residential boaters will have no choice but to moor in other locations along the canal system which may have greater visual impact on the countryside. Such unofficial residential moorings are also less likely to contribute to Council Tax. An appropriate percentage of residential berths for individual sites will vary according to local circumstances but up to 10% is generally a reasonable expectation.

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

Section		Paragraph	5.34	Table	5.7
Figure	X (page 55)	Question	5.G	Other	

2. Please set out your comments below

The potential Strategic Development Allocation for an Urban Extension at “Land East of Weston” as illustrated on Figure X also includes land south of the village between the A51 and the Trent & Mersey Canal. In view of the Conservation Area status of the canal, IWA considers that this are should be excluded from the potential site.

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.

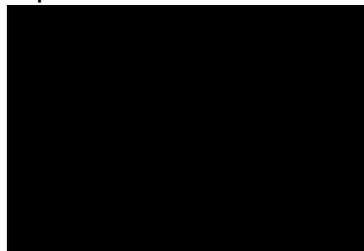
We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

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

Our ref: SHARE 81372390
Your ref:

Patrick Thomas
Spatial Planner

Forward Planning
Consultation
Stafford Borough Council
Via Email:
forwardplanningconsultations@staffordbc.gov.uk



02 March 2020

Dear Sir,

STAFFORD BOROUGH COUNCIL LOCAL PLAN REVIEW OF ISSUES AND OPTIONS DOCUMENT

We welcome the opportunity to comment on the Stafford Borough Local Plan Issues and Options document which has been produced for public consultation. We note that this is the second time Highways England has been consulted regarding the preparation of the 2020-2040 Local Plan following a consultation regarding draft SCI and SHELAA in July 2018.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Stafford Borough Local Plan, our principal interest is in safeguarding the operation of the M6, which routes through the Plan area. Specifically, our interests are centred around M6 Junctions 14 and 15, which are located within the Plan area.

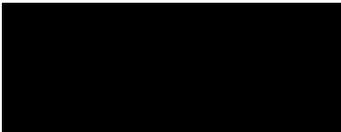
We have reviewed the consultation documents in line with DfT Circular 02/2013 *Strategic Road Network and the delivery of sustainable development*. While several growth options are addressed in the consultation document, it is noted that in all scenarios at least 50% of dwellings and 30% of employment land proposed to be developed in the local plan period is expected to be located in the Stafford area. As M6 Junction 14 lies to the north of the area, any development in this area should consider its expected impact on the continued safe operation of the junction by way of submission of a Transport Assessment (TA), or if not significant a Transport Statement (TS) at planning stage. We welcome all efforts to consult with Highways England in the pre-application stage of developments in order to address these issues at the earliest possible stage.

While we have reviewed the options proposed, none are detailed enough at this stage for Highways England to comment on whether or not they would be considered acceptable. We therefore seek to reserve the opportunity to comment on the allocation of development sites at a later stage when the impact of the proposed allocations on the SRN can be more accurately determined. Until that point, we ask that Stafford Borough Council considers the SRN when making any allocation decisions.

It is noted that the questions raised in the consultation document are focused primarily on local considerations, and therefore Highways England has no specific comments to provide on these. However, it should be noted that new development proposals arising through the Local Plan will need to consider the traffic implications of development for the SRN as well as any other relevant environmental or physical implications.

Please do not hesitate to contact me if you require any more information or clarification.

Yours sincerely,



Patrick Thomas
OD Midlands



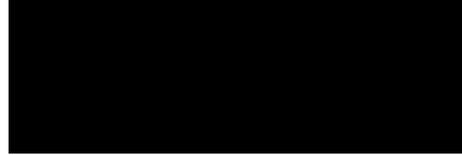
Cc: David Pyner
Kate Simmonite



GNOSALL PARISH COUNCIL

(Including the Wards of Moreton and Knightley)

Clerk of the Council:
Miss J Cooper



11th March 2020

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

Dear Forward Planning

Please find attached the response of Gnosall Parish Council to the Issues & Options Consultation document. Alex Yendole confirmed that we could respond without using the response form, since we were attempting to respond to all questions. Our response is therefore in a Word Document format.

I confirm that we find your Table 5.3 to be inaccurate and will endeavour to supply you with accurate numbers as soon as possible. At the time our Neighbourhood Plan was made (with the assistance and approval of the Borough) our total house build was 200, yet in 5.3 it is 167, over 4 years later on).

We ask that you take this into account in subsequent versions of this document and check your own records please.

Many thanks



Jayne Cooper, Clerk Gnosall Parish Council

Response to the Issues and Options Consultation from Gnosall Parish Council.

1A Is the evidence being collected a suitable and complete list?
YES.

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

NOT THAT WE CAN THINK OF.
THERE APPEARS TO BE NO STUDY OF THE
SUITABILITY/CONDITION OF EXISTING INFRASTRUCTURE IN
AREAS WHICH WOULD BE AFFECTED BY ASPECTS OF THE
PROPOSALS – i.e. SEWERAGE, ROAD LINKS North/South IN
GNOSALL, IMPACT OF HS2 AND PROPOSED HUB TO THE NORTH
OF STONE etc.

3A Do you agree that the Vision should change?

YES AS CIRCUMSTANCES CHANGE AND TO RETAIN CONTROL OF
OUR OWN FUTURE.

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

YES. CONCISE AND MANAGEABLE AND EASIER TO INTERPRET.

3C Do you agree that a new Vision, whilst maintaining a commitment to growth, should more explicitly recognise the need to respond to Climate Change and its consequences?

YES. STAFFORD AND SURROUNDS SUFFERING GREATLY FROM
FLOODING. BUILDING ON FLOOD PLAINS HAS NOT BEEN A GOOD
IDEA. IT WOULD BE HIGHLY DETRIMENTAL TO BUILD STILL
MORE WITHOUT RESOLVING CURRENT PROBLEMS AND
BUILDING TO THE HIGHEST QUALITY OF FLOOD RESISTANCE
WILL BE VITAL.

3D Should the spatially-based approach to the objectives be retained?

YES. DIFFERING AREAS NEED DIFFERING SOLUTIONS. DOES NOT
NECESSARILY LEAD TO DUPLICATION BUT TO TAILORED
RESPONSES.

3E Is the overall number of objectives about right?

NOT QUALIFIED TO JUDGE.

3F Should there be additional objectives to cover thematic issues?

POSSIBLY, TO ADDRESS SPECIFIC NEEDS i.e. HOUSING FOR THE ELDERLY AND INFIRM, SINGLE PARENT FAMILIES, SINGLE PEOPLE, RETIREMENT VILLAGES ETC THEMES AS ABOVE.

4A Efforts to increase energy efficiency within the borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary.

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

b) What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough? IN VULNERABLE AREAS, APPROPRIATE DESIGN (LIVING ON 1ST FLOOR, STORAGE OR GARAGE ON GROUND etc) WATERPROOF PLASTER, HIGH LEVEL ELECTRICITY POINTS, FLOOD PREVENTION DOORS etc

4B Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?

GROUND SOURCE, WIND AND SOLAR FARMS, POSSIBLY IN COMBINATION WITH GRAZING LIVESTOCK.

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

YES. WIND FARMS, SOLAR PANELS, GROUND SOURCE HARVESTING etc.

4D Should the council allocate sites for wind energy developments in the Local Plan? If so, where should they be located?

YES. CAN'T THINK OF ANY SITES THOUGH.

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

YES. WHY NOT?

5A a) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF?

YES. BUT THE REQUIREMENTS OF THE NPPF ARE THEMSELVES FLAWED. THE DEFINITION OF "SUSTAINABLE" HAS IN THE PAST BEEN LIMITED TO THE PROXIMITY OF ARTERIAL ROADS. THERE IS MUCH MORE TO IT THAN THIS. FOR EXAMPLE, SOME ROADS EXIST BUT ARE FAR TOO NARROW AND RESTRICTIVE TO

FACILITATE DEVELOPMENT AS PROPOSED (i.e. NORTH/SOUTH ROUTES INTO GNOSALL).
THE AVAILABILITY OF LOCAL EMPLOYMENT OR TRANSPORT TO OTHER CENTRES OF EMPLOYMENT HAS BEEN WOEFULLY INADEQUATE. THE QUESTION OF WHETHER SUITABLE COST-EFFECTIVE LEISURE FACILITIES EXIST TO SERVICE THE NEEDS OF AN INCREASED POPULATION HAS BEEN IGNORED. NPPF EXISTS SOLELY TO GET HOUSES BUILT, REGARDLESS OF WHERE. SBC MUST ADDRESS THE QUESTION OF WHAT SUSTAINABILITY REALLY IS AND THERE'S NOT ENOUGH EVIDENCE OF THAT.

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

THE PLANNING INSPECTORATE'S VIEW IS NOT MADE CLEAR. IF SUCH A POLICY IS NOT INCLUDED, WHAT IMPACT WOULD THAT HAVE ON APPLICATIONS? WOULD ALL APPLICATIONS BE REGARDED AS "SUSTAINABLE"? NOT ENOUGH INFORMATION. IN THE PAST, THE PRESUMPTION IN FAVOUR HAS DRIVEN HOUSEBUILDING REGARDLESS OF WHETHER THE BUILD WAS SUSTAINABLE OR WELL-SITED – IT WAS SOLELY AT THE WHIM OF DEVELOPERS. THIS CANNOT CONTINUE.

5B a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? What is your reasoning for this answer?

NOT QUALIFIED TO SAY BECAUSE SO MUCH DEPENDS ON WHETHER AND WHERE A GARDEN VILLAGE MIGHT BE SITED. WE ARE BEING PUNISHED FOR THE BOROUGH'S SUCCESS IN HOUSEBUILDING AS IT IS BY THE BRINGING FORWARD OF THIS PLAN. D SEEMS THE LEAST-BAD OPTION.

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

WE ARE NOT QUALIFIED TO SAY.

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

WE UNDERSTAND A DISCOUNT TO MEAN THAT THE HOMES CURRENTLY UNDER CONSTRUCTION OR APPROVED IN PRINCIPLE WILL BE COUNTED AS PART OF THE HOMES TO BE BUILT UNDER THE NEW PLAN. THIS IS DESIRABLE OR ELSE WE WILL APPEAR TO HAVE FALLEN SHORT AND MANY MORE WILL BE REQUIRED. APPLY AS BIG A DISCOUNT AS POSSIBLE IF OUR REASONING IS CORRECT.

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

NO. WE HAVE MAJOR CONCERNS ABOUT THIS BECAUSE YOUR INFORMATION IS INACCURATE AND COULD LEAD TO THE SUPPOSITION THAT GNOSALL HAS HAD AN INADEQUATE % OF HOUSEBUILDING WHEN IT HAS HAD MORE AND HAS HAD NO INCREASE OR IMPROVEMENT IN INFRASTRUCTURE WHATEVER. SINCE THE PRODUCTION OF THE LOCAL PLAN, GNOSALL HAS IN FACT HAD A REDUCTION OF SHOPS AN THEREFORE A REDUCTION IN SUSTAINABLE INFRASTRUCTURE.

TABLE 5.3 SAYS GNOSALL HAS HAD ONLY 167 HOUSES BUT OUR NP RECORDS IN EXCESS OF 200 BY NOV 2014. GNOSALL HAS ALSO EXCEEDED THE ALLOCATED 20 HOUSES IN RURAL LOCATIONS - THUS THE SETTLEMENT HIERARCHY IS BASED UPON A FALSE PREMISE AND IS SETTING UP GNOSALL TO TAKE THE BULK OF HOUSING DEVELOPMENT AGAIN.

YES SMALLER SETTLEMENTS SHOULD BE INCLUDED TOO.

5E The northern built up areas of the Borough are not properly recognised in the currently adopted Plan - most notably Blythe Bridge, Clayton and Meir Heath / Rough Close. Should these areas be identified in the Settlement Hierarchy for development?

YES!!!! FURTHERMORE, WHAT IS THE IMPACT OF THE HS2 HUB DEVELOPMENT PROPOSED FOR NORTH OF STONE? SURELY THIS WILL COMPRISE A SUBSTANTIAL PART OF THE HOUSING REQUIREMENT AND BE NEAR TO TRANSPORT ETC? SURELY CLAYTON DOES NOT FALL WITHIN THE BOROUGH?

5F a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest?

THERE IS NO SPECIFIC MENTION OF BROWNFIELD DEVELOPMENT. THERE IS NO COMMITMENT TO PROVIDING INFRASTRUCTURE. NONE OF HS2 AND IMPLICATIONS THEREOF.

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

ALL ARE VIABLE IN THE RIGHT LOCATION
NPPF STATES THAT LOCAL PLANS SHOULD INCLUDE POLICIES TO ADDRESS OBJECTIVELY ASSESSED NEED. WHERE IS THE EVIDENCE THAT THERE IS A LOCAL "NEED" FOR RIBBON DEVELOPMENT ALONG THE A518, WHICH IS THE SCENARIO PROPOSED BY ONE OF THE OPTIONS PUT FORWARD? THERE MAY BE A NEED FOR HOUSES ACROSS THE BOROUGH BUT IS THERE A NEED FOR THEM HERE, WHERE NO INFRASTRUCTURE EXISTS EXCEPT A BUSY ROAD, FREQUENTLY FLOODED OR MUDDY, WHICH CURRENTLY HAS NO FOOTPATH DESPITE PARENTS BEING

EXPECTED TO WALK THEIR CHILDREN TO SCHOOL BECAUSE THEY ARE NOT FAR ENOUGH AWAY TO QUALIFY FOR TRAVEL PASSES? THE NUMBERS ARE BEING PRIORITISED OVER TRUE SUSTAINABILITY AND LOCAL NEED.
AND IF CC FARMLAND IS SOLD, WHAT DOES THAT DO FOR LOCAL EMPLOYMENT? OR FOOD PRODUCTION?

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

BEST DEPENDS UPON THE EXACT LOCATION. SEE ABOVE.

5G Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements? If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate? Please explain your answer.

YES GIVEN THE NUMBERS REQUIRED. SUCH A DEVELOPMENT MUST BY ITS NATURE HAVE THE NECESSARY INFRASTRUCTURE. LOCATIONS WHICH ARE SUITABLE; iii, iv, v, vi. ALL INCORPORATE A DEGREE OF BROWNFIELD LAND WHICH IS HIGHLY DESIRABLE. IS IT NECESSARY TO COMBINE BOTH GARDEN COMMUNITY AND MAJOR URBAN EXTENSION?

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

NO. OPTIONS 3 AND 5 ARE ACCEPTABLE BUT NOT 6. EXISTING TRANSPORT CORRIDORS ARE WELL UTILISED ALREADY AND HAVE TAKEN A LION'S SHARE. HOUSING ALONG THESE DOES NOT AUTOMATICALLY PRODUCE EMPLOYMENT OPPORTUNITIES. GNOSALL HAS NO NEED FOR SUCH AN INCREASE, NEITHER DOES HAUGHTON. THERE ARE NO EMPLOYMENT OPPORTUNITIES IN EITHER SETTLEMENT. HS2 HUB IN NORTH STONE WILL CREATE SUCH NEEDS AND OFFER EMPLOYMENT TOO. STOP PICKING OFF KSVs AS EASY TARGETS WITHOUT DEVELOPING WHAT THEY CAN OFFER TO RESIDENTS.

5.7 ESTIMATES BETWEEN 1000-2500 JOBS IF 325 HOUSES ARE BUILT ALONG THE A518. WHERE ARE THEY COMING FROM? IT'S INSULTING AND LUDICROUS. HOUSES DO NOT PRODUCE JOBS. THEY PRODUCE PEOPLE DRIVING TO THE JOBS THEY ALREADY HAVE.

YOU RECOGNISE IN 5.61 THAT EXISTING INFRASTRUCTURE COULD BE OVERWHELMED BY RIBBON DEVELOPMENT BUT CONCEDE THAT IT MAY BE DESIRABLE IN UNDER-PRESSURE/HIGH DEMAND SETTLEMENTS. WHERE IS THE

EVIDENCE THAT EITHER GNOSALL OR HAUGHTON FALL INTO THIS CATEGORY? NONE IS PROVIDED.

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

AS ABOVE

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

DO NOT KNOW.

5I Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan? Please explain your answer

YES

5J What combination of the four factors: 1. Growth Option Scenario (A, D, E, F, G); 2. Partial Catch Up 3. Discount / No Discount 4. No Garden Community / Garden Community Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process? Please explain your answer.

ALL OF THESE SHOULD BE CONSIDERED. FACTOR IN THE ANSWERS TO THE RELEVANT SECTIONS GIVEN ABOVE.

5K Do you consider the EDHNA recommendations for an Employment Land requirement of between 68-181ha with a 30% (B1a/B1b) : 70% (B1c/B2/B8) split reasonable? If not, what would you suggest and on what basis?

THIS IS NOT A QUESTION THAT ANY LAYPERSON COULD REASONABLY BE EXPECTED TO ANSWER.

5L Do you agree that the assumptions made in the EDHNA about the need to replace future losses of employment land are reasonable? If not, please explain why

WE ARE NOT QUALIFIED TO JUDGE. BUT WE ARE VERY CONCERNED THAT THIS DOCUMENT DISCUSSES NO CONCERNS ABOUT THE POSSIBLE LOSS OF FARMING LAND – WHICH IS CRUCIAL IN REGARD TO CLIMATE CHANGE, FLOODING, FOOD SELF-SUFFICIENCY, LEISURE AND MENTAL HEALTH AND SO FORTH. IT ALSO FAILS TO RECOGNISE THAT IN SEVERAL KSV, GNOSALL INCLUDED, THE POSSIBILITIES FOR EMPLOYMENT ARE LIMITED BY NATURE OF THE PHYSICAL LOCATION AND LAND AVAILABILITY. THERE IS NO SPARE CAPACITY TO BUILD ADDITIONAL INDUSTRIAL EMPLOYMENT WITHIN THE SETTLEMENT BOUNDARY. THE ONLY POSSIBILITY FOR

ADDITIONAL LAND IS TO REPURPOSE FARMLAND AND THIS IS NOT DESIRABLE ON GROUNDS OF EMPLOYMENT, FOOD PRODUCTION AND FLOODRISK.

THERE IS A VAST AMOUNT OF UNUSED COMMERCIAL PROPERTY IN STAFFORD TOWN CENTRE BUT NO MENTION IS MADE OF ANY PLANS TO MAKE BETTER USE OF THAT, EITHER FOR COMMERCE OR HOUSING. THIS IS AN UNTAPPED RESOURCE WHICH COULD GENERATE GENUINE EMPLOYMENT WITH SYMPATHETIC RATING LEVELS etc AND WHICH PRESENTLY GIVES A NEGLECTED FEEL TO THE COUNTY TOWN.

- 5M** Should the New Plan broadly mirror the spatial distribution for new employment prescribed by the current Plan? If not, what would you suggest and on what basis?

YES BUT WE HAVE CONCERNS THAT LARGER KEY SERVICE VILLAGES HAVE NO REALISTIC EMPLOYMENT OPPORTUNITIES.

- 5N** Do you consider the employment distribution proposed by Table 5.9 for a New Plan without and with a Garden Community / Major Urban Extension to be reasonable? If not please explain your reasoning

WE ARE NOT QUALIFIED TO INTERPRET THIS INFORMATION

- 5O** Are there any additional sites over and above those considered by the SHELAA that should be considered for development? If so please provide details via a "Call for Sites" form* *
<https://www.staffordbc.gov.uk/node/227026>

- 5P** Do you agree that settlements of fewer than 50 dwellings should not have a settlement boundary? If not please provide reasons for your response including the specific settlement name.

NO. SMALLER SETTLEMENTS MAY BE ABLE TO PROVIDE A SMALL NUMBER OF DWELLINGS BUT WITHOUT A BOUNDARY, THIS NUMBER WOULD FORM PART OF THE RURAL AREA AND BE SUBJECT TO GREATER LIMITATION. THEREFORE TO MAXIMISE GROWTH POTENTIAL AND SAFEGUARD SETTLEMENT INTEGRITY A BOUNDARY PROVIDES A DEFINED LIMIT FOR DEVELOPMENT.

- 5Q** Do you agree with the methodology used to define settlement boundaries? If not please provide reasons for your response

YES BUT WOULD WISH THE PARISH COUNCIL OF ANY VILLAGE UNDER THIS CONSIDERATION TO BE INVOLVED.

- 6A** a) What level of employment space provision for the Plan Period 2020-2040 do you consider to be optimal?

WE ARE NOT QUALIFIED TO JUDGE.

b) Do you consider the distribution between business classes proposed by Table 6.1 appropriate? Please explain your answer. Please explain your answer

AGAIN NOT ABLE TO JUDGE WITH ANY ACCURACY. IT SHOULD BE NOTED THAT THESE EMPLOYMENT ACTIVITIES ARE NOT PERTINENT TO GNOSALL OR HAUGHTON, SO IF HOUSES WERE BUILT AROUND THESE VILLAGES, THIS WOULD GREATLY INCREASE THE WORK-RELATED TRAFFIC IN AN ALREADY CONGESTED TOWN CENTRE.

WE ARE CONCERNED THAT THE LOSS OF STAFFS UNIVERSITY AND DOWNGRADING OF STAFFORD HOSPITAL HAVE LED TO CONSIDERABLE JOB LOSSES AND LOSS OF PRESTIGE IN THE COUNTY TOWN. THE LEVEL OF BUILDING SPOKEN OF IN THIS PLAN MAKES THE UPGRADING OF THE HOSPITAL AN ABSOLUTE NECESSITY AND THE RETURN OF UNIVERSITY PROVISION HIGHLY DESIRABLE.

6.B To ensure optimal economic prosperity, do you consider that the Council should: a) Allocate employment land so that it extends existing employment premises / areas in the Borough? b) Allocate employment in both urban and rural areas?

THERE'S A GREAT DEAL OF COMMERCIAL EMPLOYMENT LAND CURRENTLY NOT BEING USED. WHERE IS THAT IN THE PROPOSALS? IT SHOULD BE FULLY UTILISED BEFORE ANY MORE LAND IS SO DESIGNATED. WHY ALLOCATE MORE, TAKING GREEN, WHEN UNDERUSE EXISTS?

HOW CAN YOU "ALLOCATE" LAND IN RURAL AREAS SUCH AS GNOSALL WHERE NO FORMER LAND EXISTS ANY LONGER (HAVING BEEN BUILT OVER THE YEARS) UNLIKE OTHER KSV WHERE INDUSTRIAL GROUND IS ALREADY IN EXISTENCE. BROWNFIELD LAND MUST BE UTILISED BEFORE ANY NEW LAND IS USED.

EMPLOYMENT SHOULD BE AS NEAR AS POSSIBLE TO WHERE PEOPLE LIVE. THEREFORE THE MAJOR CENTRES, WHERE THE MAJORITY OF FACILITIES ARE, SHOULD BE THE SITE FOR SUCH EMPLOYMENT.

6.C Which specific locations (if any) do you think would benefit from the increased provision of employment premises? If so, for what type of activity?

USE THE CURRENT PROVISION IN STAFFORD TOWN CENTRE AND GET RID OF THE GHOST TOWN/CHARITY SHOP/MONEY SHOPS VIBE, ESPECIALLY THE NORTH END.

6.D In allocating employment land should the Council consider a zoning approach* in order to encourage higher value-added activities? *Note - where site allocations in specific locations have specific Use Classes nominated to them

UNABLE TO JUDGE THE BENEFIT OF SUCH AN APPROACH.
BUSINESSES CANNOT CURRENTLY AFFORD BUSINESS RATES –
WOULD THIS PROPOSAL HELP?

- 6E** Should the Council propose a policy preventing the redevelopment of employment premises to residential units? If so, should the scope of such a policy be limited in any way? Please explain the rationale for your answer

EMPLOYMENT PREMISES UNUSED FOR A TIME ARE BETTER USED FOR HOUSING THAN LYING EMPTY BUT THIS MAY WELL REQUIRE COMPULSORY PURCHASE OR OTHER MEANS. EVERY OPPORTUNITY SHOULD BE TAKEN TO RETURN THE TOWN CENTRE TO A VIBRANT HUB, WITH SMALL, INDIVIDUAL RETAILERS (ATTRACTED BY PREFERENTIAL RATES) WHICH GIVE A TOWN A UNIQUE CHARACTER INSTEAD OF BEING A SMALLER CLONE OF OTHER TOWNS. THIS IS THE ONLY WAY TO ATTRACT VISITORS. PARKING MUST BE ADDRESSED – PEOPLE WILL NOT PAY ANYMORE WHEN THEY CAN DRIVE TO NEIGHBOURING OUTLETS AND PARK FREE. THE CANNOCK OUTLET CENTRE WILL FURTHER DECIMATE STAFFORD UNLESS ACTION OF THIS KIND IS TAKEN.

- 6F** 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.

SEE ABOVE

- 6.G** a) Do you consider that a lack of suitable office space is a potential barrier to inward investment within the Borough? b) Where should the council seek to encourage the development of modern office space? Please explain the rationale for your answer

FORMER RETAIL UNITS MAY BE ABLE TO PROVIDE OFFICE SPACE. MORE EMPHASIS ON MODERN TECHNOLOGY ENCOURAGES HOME WORKING AND REDUCES TRAVEL CONGESTION. INFRASTRUCTURE FOR THIS NEEDS TO IMPROVE.

- 6H** To assist the rural economy should the Council:
a) Allocate land for employment purposes throughout the rural areas of the Borough?

YES BUT THAT DOES NOT MEAN TAKE FARMLAND AND DESIGNATE IT EMPLOYMENT. SOME VILLAGES HAVE NO SUCH LAND NOR ANY REASONABLE POSSIBILITY OF ANY. ONLY IF A GENUINE NEED CAN BE IDENTIFIED SHOULD LAND BE ALLOCATED. EXISTING FORMER INDUSTRIAL LAND SUCH AS LADFORD FIELDS SHOULD BE USED IN PREFERENCE.

b) If so, which area(s) do you consider would be appropriate for this purpose? Extend existing rural business parks? If so, which ones?

c)

EXTEND EXISTING BUSINESS/INDUSTRIAL PARKS WHERE POSSIBLE BUT USE TOWN CENTRE PROPERTIES AND EXISTING FORMER SITES FIRST. ANY NEW GARDEN VILLAGE SHOULD HAVE ADJOINING EMPLOYMENT LAND.

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?

POSSIBLY YES. BUT THAT MAY MEAN THE CONSERVATION OFFICER BECOMING FAR MORE FLEXIBLE ABOUT WHAT IS PERMISSIBLE IN ORDER TO UTILISE UNUSED PROPERTY IN CONSERVATION AREAS.

d) Propose a policy stipulating the installation of super-fast broadband to all new business development in the rural areas of the Borough?

OF COURSE. BUT SUPPLIERS WILL ONLY INSTALL WHERE THERE IS A PROFIT TO BE MADE SO ARE SBC PROPOSING A COUNCIL SUBSIDY TO MAKE THIS MORE PROFITABLE AND ATTRACTIVE TO THE SUPPLIER? IF YOU MAKE SUPERFAST AVAILABLE TO BUSINESSES, THEN PRIVATE CUSTOMER DEMAND WILL ALSO RISE.

MOBILE COVERAGE IS ALSO VERY PATCHY.

6.J To assist the rural economy should the Council consider a policy stipulating the installation of super-fast broadband throughout the rural areas of the Borough?

TO ASSIST RESIDENTS TOO!

6K Are there any further potential Major Developed Sites in the Green Belt that should be considered for inclusion? If so please provide details.

NO. WE DISAPPROVE STRONGLY OF MAJOR DEVELOPMENT SITES IN THE GREEN BELT.

6.L The visitor economy is considered by Policies E6 (“Tourism”) and E7 (“Canal Facilities and New Marinas”) in the currently Adopted Local Plan.

a) Do these policies continue to be sufficient in their current form or do they need adjustment? If so, how?

NO. THERE ARE INSUFFICIENT CANAL AND MARINA FACILITIES IN THE CURRENT ADOPTED PLAN.

b) Are there any visitor economy themes that should be more explicitly addressed? If so, which.

- 7.A a) Do you consider that the hierarchy for Stafford Borough should consist of Stafford and Stone town centres with Eccleshall local centre? If not please give a reason for your response**
 YES. ECCLESHALL IS A VERY WELL-EQUIPPED CENTRE WITH A WIDE RANGE OF FACILITIES AND GOOD INFRASTRUCTURE ROUTES IN ALL DIRECTIONS.
- b) Based on the evidence in the Stafford Borough Town Centre Capacity Assessment do you agree with the level of future retail convenience and comparison floorspace provision?**
 STAFFORD WOULD ALSO BENEFIT FROM THE ADDITION OF INDEPENDENT RETAILERS. PARKING IS A MAJOR ISSUE AND CONGESTION A MASSIVE ONE.
- 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?**
 YES WITH RESERVATIONS ABOVE.
- b) Stafford and Stone have a proposed town centre boundary as well as a Primary Shopping Area boundary, with Eccleshall having a local centre boundary. Are these boundaries appropriate for future centre uses? If not please provide a reason for your response and an updated map (if appropriate).**
 ECCLESHALL HAS A CONSERVATION AREA BOUNDARY AND A SETTLEMENT BOUNDARY BUT NO LOCAL CENTRE BOUNDARY IN DOCUMENTS INCLUDING THE NEIGHBOURHOOD PLAN?
 STAFFORD TOWN CENTRE MAY HAVE A BOUNDARY BUT WITHIN THAT BOUNDARY ARE MANY MANY EMPTY SHOPS AND UNITS. THESE SHOULD BE USED.
- c) For Stafford a number of new development sites are suggested within the town centre area. Do you consider these sites are sufficient to meet future needs or are there other locations to consider? If so please specify**
 PROBABLY NOT SUFFICIENT BUT A GOOD START. WHAT ROOM EXISTS AT KINGSMEAD? BUT NOTE PARKING AND CONGESTION ISSUES AS ABOVE, PLUS BUSINESS RATES ISSUES.
- 7.C Do you consider the local impact floorspace thresholds proposed for Stafford, Stone and Eccleshall to be appropriate? If not please provide reasons for your response.**
 NOT QUALIFIED TO SAY.
- 8.A Should the council continue to encourage the development of brownfield land over greenfield land?**
 YES YES YES – VITAL TO CLIMATE CHANGE, TOWN CENTRE REGENERATION, FLOODING etc BROWNFIELD USE MUST BE MANDATORY BEFORE GREENFIELD IS EVEN CONSIDERED.
- 8.B Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough? If so do you consider: (i) the implementation of a blanket density threshold; or (ii) a range of density thresholds reflective of the character of the local areas to be preferable? Why do you think this?**
 RECENT BUILDS HAVE BEEN OF SMALLER SIZE AND GREATER DENSITY THAN IN FORMER TIMES. NEW ESTATES OFTEN APPEAR OVERCROWDED, OFFER LITTLE PRIVACY OR PERSONAL SPACE AND EXACERBATE SOCIAL PROBLEMS. WOULD MDT

AMELIORATE THIS? IN ANY EVENT, THEY SHOULD REFLECT THE CHARACTER OF THE LOCAL AREA.
MDT ARE ESSENTIAL TO AVOID THE CREATION OF GHETTOES AND PROBLEM AREAS.

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

YES BUT TO DATE, INSUFFICIENT PROVISION OF PUBLIC TRANSPORT, INDEED CUTS TO PUBLIC TRANSPORT, MEAN THAT TRAVELLING THIS WAY IN RURAL AREAS (ESPECIALLY AT NIGHT) IS WELL NIGH IMPOSSIBLE.

IF HIGH DENSITY HOUSING IS BUILT (WHICH BY DEFINITION ATTRACTS LOW-INCOME FAMILIES OFTEN WITHOUT PRIVATE TRANSPORT) THEY WILL BE STRANDED AND COMPANIES WILL NOT PROVIDE UNECONOMIC ROUTES. THIS ALSO IMPINGEDS UPON HOSPITAL PROVISION AS TRAVEL TO STOKE IS IMPOSSIBLE.

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

IF THOSE STANDARDS ARE REASONABLE, YES. BUT THEY MAY NOT BE GOOD ENOUGH, IN WHICH CASE WE NEED TO DO BETTER. RECOGNISE THAT NOT ALL DOWNSIZING COUPLES WANT ONE BED LIVING. THEY MAY NEED MORE.

CHILDREN ARE OFTEN UNABLE TO LEAVE HOME AND THEREFORE MORE ROOM TO ACCOMMODATE MORE ADULTS WITHIN A DWELLING IS NEEDED.

**8.E In the New Local Plan should the Council
a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings?**

YES TO NEW BUT IMPRACTICAL FOR CONVERTED.

b) Only apply the Nationally Described Space Standards to new build dwellings?

YES

c) Not apply the Nationally Described Space Standards to any development? Please explain your answer.

DEFINITELY NOT

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

TABLE DOES NOT ADD UP PERCENTAGES CORRECTLY, DOES NOT MAKE SENSE, SO IMPOSSIBLE TO SAY.

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?

SMALLER BUT NOT JUST ONE-BED. AFFORDABLE HOUSING GENERALLY APPEARS TO BE A PROBLEM. BOTH ELDERLY AND NEW STARTERS WOULD BENEFIT FROM 1-2 BED PROPERTIES. THIS COULD HAVE BEEN STIPULATED IN THE CURRENT PLAN. BUILDERS DO NOT CHOOSE TO BUILD SMALLER PROPERTIES/BUNGALOWS AS PROFITS ARE LOWER THEREFORE COERCION WILL BE NECESSARY.

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

ALL PROPERTIES SHOULD BE WHEELCHAIR ACCESSIBLE.

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

YES. MINIMUM 5 BUNGALOWS OR 10% OF THEBUILD, WHICHEVER IS THE GREATER.

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

GARDENS IN PROPORTION TO THE PROPERTY WOULD SEEM SENSIBLE OR ELSE A GHETTO WILL DEVELOP. SHARED GARDENS ARE OFTEN VERY EXPENSIVE TO MAINTAIN AND ARE NOT MAINTAINED AT ALL WELL SO NO BENEFIT ACCRUES. BUNGALOWS MIGHT HAVE A COMMUNITY SHARED GARDEN SERVICING UP TO SAY 6 PROPERTIES BUT A LOT DEPENDS ON THE COVENANTING ARRANGEMENTS OR LAND MANAGEMENT FEE.

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

YES.

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

MORE PROPERTIES WITH THE POTENTIAL FOR CONVERSION DUE TO PHYSICAL LIMITATIONS. IE STAIRS WIDE ENOUGH FOR STAIRLIFTS etc.

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

THE LOSS OF THE UNIVERSITY HAS AFFECTED THIS SURELY?
THERE IS A NATIONAL SURPLUS WE BELIEVE.

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

THE ISSUE IS WHETHER DEVELOPERS WANT TO PROVIDE THEM AND THE ANSWER TO THAT IS NO. THEREFORE, SBC MUST MAKE A MAJOR COMMITMENT TO DEMANDING AFFORDABLE HOMES BE BUILT – THE MARKET WILL SEEK TO AVOID THIS AT EVERY TURN.

IT IS IMPOSSIBLE FOR ANY LAY PERSON TO KNOW WHAT FIGURE IS ACHIEVABLE BUT THIS SEEMS TO BE A STRETCH GIVEN CURRENT BUILD-OUT RATES.

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

NO

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?

AFFORDABLE IS NEEDED IN RURAL AS WELL AS URBAN. SOME SHOULD BE DESIGNATED FOR RESIDENTS WITH A LOCAL CONNECTION. SO YES THERE SHOULD BE A REQUIREMENT EVEN ON SMALL SITES.

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

YES – BETTER THAN THE ALTERNATIVE. COUNCIL SHOULD BE GIVEN MORE POWER TO EXERCISE CONTROL OVER DEVELOPERS.

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

IDEALLY YES BUT EXACT PROPORTION DIFFICULT TO SAY. 42 CURRENT REQUESTS ISN'T MANY.

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

YES.

- 8.0 a) Do you consider that the approach detailed above will be beneficial to smaller settlements of Stafford Borough and residents?**

POSSIBLY – RURAL SITES ARE PERHAPS FAVOURED FOR SELF-BUILD.

- f) Do you think it would be beneficial to only allow people to build their own homes in smaller settlements if they have a demonstrable connection to the locality of the proposed development site?**

THERE IS AN ARGUMENT FOR ORGANIC AND NATURAL GROWTH TO SAY NO TO THIS RESTRICTION

9.A Should the Council

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

YES. THIS IS IGNORED IN FAVOUR OF BUILDING AT PRESENT

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

YES

9.B How should plan policies be developed to seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider nature recovery network?

EXISTING LAWS ARE SUFFICIENT BUT THEY ARE NOT ENFORCED. THIS IS THE KEY.

9.C Should the new Local Plan:

- a) Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate;**

YES

- b) Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement;**

YES

- c) Require, through policy, increased long term monitoring of biodiversity mitigation and enhancement measures on development sites**

YES – BUT WE NEED EFFECTIVE ENFORCEMENT

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

CANNOCK CHASE SHOULD BE MAINTAINED AS IT IS – GREEN SPACE, NO BUILDING.

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?

IT WOULD HELP.

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.

HOW DOES THIS IN ANY WAY MESH WITH PROPOSALS IN THIS PLAN WHICH DEPEND UPON THE SALE OF COUNTY FARMLAND? ALLOTMENTS ETC ARE TINKERING AT THE EDGES. TO MAKE A REAL DIFFERENCE, PROTECT COUNTY FARMS AND DON’T BUY THE LAND!

If yes, are the following measures appropriate?

a) Protecting and enhancing allotments, community gardens and woodland;

YES PROTECT WHAT WE HAVE BUT SEE ABOVE

b) Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites;

YES

c) Requiring major residential developments to incorporate edible planting and growing spaces;

NO

d) Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities

NOT SURE WHAT THIS MEANS

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 BUT DEVELOPERS WILL WRIGGLE OUT OF THEM AND ENFORCEMENT NEVER GETS AROUND TO ENFORCING

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

UNSURE

9.I Should the new local plan:

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

YES TO ALL THE ABOVE BUT DEVELOPERS WILL RESIST AND WE NEED A ROBUST PLANNING DEPARTMENT TO FIGHT SUCH RESISTANCE

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

UNQUALIFIED TO COMMENT

9.K Do you consider that the current “Shop Fronts and Advertisements” SPD provides sufficient guidance for shop front and advertisements issues in the Borough? Please explain your rationale

UNQUALIFIED TO COMMENT

**9.L To support a new Local Design Review Panel should the new Local Plan:
a. Require complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision?**

YES BUT EXPERTS OFTEN DO A DESKTOP EVALUATION. LOCALS SHOULD BE INVOLVED AND EXPERTS SHOULD CONSULT WITH THEM TO GAIN AN UNDERSTANDING OF CURRENT LOCAL CONCERNS

b. To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc.

YES

c. Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough.

YES

9M Do you consider the designation of sites as Local Green Space to be necessary throughout the Local Plan?

YES BUT NEEDS CONSULTATION RATHER THAN IMPOSITION

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

YES. TRINITY FIELDS. PARKSIDE. HIGHFIELDS.

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

DON'T UNDERSTAND QUESTION

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

YES. WOODSEAVES. ADBASTON. SWINNERTON. ECCLESHALL.

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

YES

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

YES

f. Should the Council seek to apply Natural England's ANGSt to new development?

YES

g. Should the Council seek to develop a bespoke standard in relation to open and/or play space?

POSSIBLY IF IT IS IN EXCESS OF STANDARDS ABOVE

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

YES - THIS IS PART OF THE INFRASTRUCTURE WE HAVE SPOKEN OF EARLIER. SHOULD APPLY TO DEVELOPMENT OF 50 OR MORE.

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

YES BUT DON'T THEN PRETEND IT MAKES THE DEVELOPMENT SUSTAINABLE!

j. Should the Council require all high density schemes to provide communal garden space?

YES

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

YES

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

CAN'T SAY.

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)

YES. SHOULD BE PART OF ANY BNEW BUILD.

c) Ensure all major development is accessible by regular public transport?

YES OF COURSE.

d) Enforce Air Quality Management Zones around areas of notable biodiversity importance?

UNSURE

d) Employ any further methods which you consider will aid in the improvement of air quality within the borough

NOT BUILD CLOSE TO MAJOR ARTERIAL ROADS AND
MOTORWAYS

- 10.B The currently adopted Plan for Stafford Borough does not enforce any policy to mitigate for the impacts of NO2 particles on internationally designated sites. Therefore should the council enforce a scheme whereby any development likely to result in an increase of NO2 deposition on these sites in Stafford Borough must contribute to a mitigation programme?**

YES

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

- a) Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site?**

YES

- b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?**

YES

- g) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford Borough?**

YES

- 11.A a. Should the New Local Plan 2020-2040 continue to address health and wellbeing via relevant associated policies in the way the currently adopted plan does?**

YES

- b. Or should an alternative approach to the integration of health and wellbeing issues into the New Stafford Borough Local Plan be adopted?**

SUCH AS WHAT?

- c. Where should references to Health and Wellbeing be strengthened in the New Stafford Borough Local Plan?**

THROUGHOUT

- 11.B If at Question 11.A b you considered that the Council should adopt an alternative approach to the integration of health and well-being issues into the New Local Plan which potential model would you advocate? (see Para 11.10: Models A; B; C) What is your reasoning for this answer? Do you consider that there is an alternative approach to this issue that might be considered? If so please describe/give an example.**

B AND C SEEMS IDENTICAL BUT EXCLUSION ZONES AROUND SCHOOLS VERY GOOD IDEA. HIAs ARE TO BE DESIRED

- 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**

IN THEORY YES BUT PAST EXPERIENCE SUGGESTS THAT THE EXISTENCE OF A BUS ROUTE, A MAIN ROAD AND A CYCLE TRACK ENABLES DEVELOPERS TO CLAIM SUSTAINABILITY

- 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.**

YES

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

YES BUT THEY HAVE TO BE MAINTAINED AND PRESENTLY THEY ARE NOT BEING

- 12.C a) Is there is an issue with overnight lorry parking at certain locations within Stafford Borough? If so, where?**

YES. MORETON. GNOSALL in residential areas at present.

- c) Is it appropriate to make provision for new overnight lorry parking at existing employment locations where new development will take place? If not please provide a reason for your response.**

YES

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

YES VITAL. CAR PARKING SPACE MUST BE PROVIDED. MANY FAMILIES HAVE 4 CARS PER HOUSEHOLD ESPECIALLY WITH YOUNGSTERS NOT LEAVING HOME.

- b) If so should a similar approach of minimum standards be used for new developments across Stafford Borough or should maximum parking**

standards be identified for Stafford town centre area? Please provide a reason for your response

ONE OF THESE IS ABOUT SHOPPING PARKING. THE OTHER IS ABOUT RESIDENTIAL.

- 12.E Do you consider that a new policy setting out the approach to new electronic communication infrastructure, its extent and location is required for Stafford Borough? Please provide a reason for your response**

LONG OVERDUE

- 14.A a) Do you agree with the general approach to monitoring and reviewing New Local Plan policies and proposals?**

YES

b) Are the currently employed indicators appropriate to monitor key planning policy issues? If not please give a reason for your response

UNSURE

NETWORK RAIL EMAIL RESPONSE – 11 MARCH 2020

From: TownPlanning LNW [REDACTED]
Sent: 11 March 2020 14:45
To: List-ForwardPlanning-SBC
Subject: Stafford - Local Plan 2020-2040 Issues and Options

Stafford - Local Plan 2020-2040 Issues and Options

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).

Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.

When making a local plan allocation the effect of increased patronage at local stations from the housing must be taken into account. Therefore section 106 or CIL funding would need to be allocated for station improvements.

From

**Diane Clarke
Town Planning Technician NW&C
AssocRTPI
Network Rail**

HIGH SPEED 2 Ltd EMAIL RESPONSE – 12 MARCH 2020

From: Town Planning [REDACTED]
Sent: 12 March 2020 09:40
To: forwardplanningconsultations
Subject: HS2 respond New Stafford Borough Local Plan 2020-2040: Issues & Options

Our ref: HS2-STC-PE-009

Dear Alex Yendole,

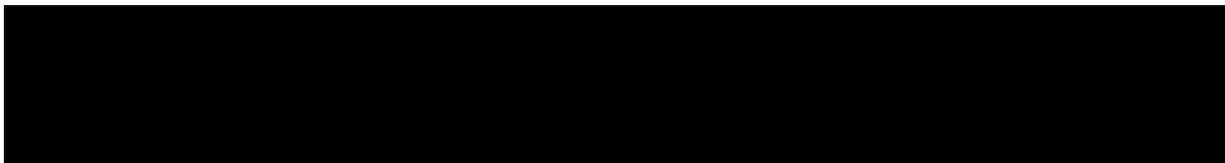
Thank you for consulting HS2 Ltd on the above consultation, we have the following comments to make:

With regards to the last sentence of paragraph 2.19, to clarify, I can confirm that current plans are for HS2 services to utilise the existing station's facilities. There is no operational requirement for, or commitment on HS2 Ltd to provide an integrated station in Stafford Town.

HS2 Ltd notes and welcomes that the council's evidence base (Economic and Housing Development Needs Assessment, 2020) seeks to quantify future jobs growth associated with the investment HS2 will bring to Stafford borough. HS2 Ltd supports the council in its proposals to capture and build upon the benefits resulting from the provision of additional capacity and improved connectivity that HS2 services will bring to Stafford within the plan-period. To this end, HS2 Ltd could provide technical support to the council in terms of its plans for an integrated station in Stafford and, if appropriate, the Stafford Gateway proposal.

Kind Regards

**Reiss Graham | Town Planning Advisor – Phase Two | Infrastructure Directorate
|HS2 Ltd**





Website: <https://cannock-chase.co.uk/>

Date: 19th February 2020

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

Dear Sirs

Draft Stafford Borough Local Plan 2020 – 2040: Issues and Options consultation

Thank you for allowing the Cannock Chase Area of Outstanding Natural Beauty (AONB) Partnership the opportunity to comment on the above consultation. The comments on behalf of the Cannock Chase Area of Outstanding Natural Beauty (AONB) Joint Committee are set out below.

As you are aware, the AONB is a statutory designated area under the Countryside and Rights of Way Act 2000 (CROW). CROW places a duty on all public bodies to “..have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty..”. The Cannock Chase AONB Management Plan, prepared in accordance with CROW, sets out how the AONB will be conserved and enhanced.

The Cannock Chase AONB Partnership has a duty to advise on planning matters, as set out in the AONB Planning Protocol. The Partnership’s focus is on ensuring that the special qualities of the AONB are recognised, protected and enhanced in all development plans.

SECTION 1. INTRODUCTION.

Question 1.A. Is the evidence that is being gathered a suitable and complete list? 1.B. Have any key pieces of evidence necessary for Stafford Borough’s new Local Plan been omitted.

The Cannock Chase AONB Management Plan, and its supporting documents, which provide a strategic context for the AONB, should be used to inform the evidence base for the Development Plan¹. This is one of the “tests” that the AONB Partnership advise local

¹ The evidence for the Cannock Chase AONB Management Plan 2019-24 includes, for example, Landscape Character Assessment (2017), State of the AONB Report (2018), Historic Environment Assessment (2015), Visitor Management Strategy (2014).

authorities apply in order to ensure that the law and policy in respect to AONBs is properly applied (see *response to Question 9D*).

In order to ensure that the law and policy in respect to AONBs is properly applied during the preparation of a Development Plan, the AONB Partnership advises that local authorities exercise the following tests to the AONB and its setting:

1. Has the duty to have regard to the statutory purpose of the AONB to “conserve and enhance” been carried out?²
2. Have the vision, policies and actions contained within the AONB Management Plan been taken into account?³
3. Was the Cannock Chase AONB Management Plan, and its supporting documents, which provide a strategic context for the AONB, used to inform the evidence base for the Development Plan?⁴
4. Does the Development Plan include criteria-based policies which reflect the highest level of landscape protection afforded to AONBs, in line with paragraph 172 of NPPF?
5. Has due consideration been given to safeguarding the integrity of the AONB from incremental and cumulative development in the wider area (Lichfield District Council, South Staffordshire Borough Council and Cannock Chase District), in accordance with the duty to co-operate?⁵

SECTION 3 VISION AND STRATEGIC OBJECTIVES

Question 3.D

The protected landscapes of the AONB are a critical part of the Borough’s rich natural environment. In defining the new vision and key objectives, stronger reference to conserving and enhancing Cannock Chase AONB, and its setting, for its landscape and natural beauty and the services it provides indirectly as a result of its special qualities would be appropriate and warmly welcomed.

SECTION 4. SUSTAINABILITY AND CLIMATE CHANGE

Questions 4A to 4E

The section on sustainability and climate change fails to recognise and make a link to the vital contribution that existing natural capital makes to mitigating and adapting to the effects of climate change by, for example, capturing and storing carbon, ameliorating temperature extremes, storing flood waters, filtering pollutants, and biodiversity resilience.

Policies for sustainability and climate change need to support the protection and enhancement of natural capital assets, which will include Cannock Chase AONB. In relation to Question 4.D, potential site allocation of wind energy developments would need to ensure full consideration of potential landscape and visual impact on the AONB. Site selection

² Section 85 of the Countryside and Rights of Way Act 2000 requires all relevant authorities to have regard to the statutory purpose of AONBs in exercising or performing their functions.

³ The AONB Management Plan is a material consideration that should be taken into account when preparing Development Plans.

⁴ The evidence for the Cannock Chase AONB Management Plan 2019-24 includes, for example, Landscape Character Assessment (2017), State of the AONB Report (2018), Historic Environment Assessment (2015), Visitor Management Strategy (2014).

⁵ Local Planning Authorities have a duty to co-operate under Section 110 of the Localism Act on sustainable development or use of land that would have a significant impact on at least two planning areas or on a planning matter that falls within the remit of a county council.

should include assessment of landscape sensitivity and potential landscape and visual impact to avoid detrimental impacts on the setting of the AONB.

SECTION 6: DELIVERING ECONOMIC PROSPERITY

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.**

Section 8 of the AONB Management Plan (2019 – 2024), and its policies, are clear in support for communities and businesses, but this needs to be balanced with the legislative requirement to simultaneously conserve and enhance the special qualities (and natural beauty) of the AONB. Potential development of rural businesses in the AONB therefore requires particular restrictions to ensure that development proposals are of a high quality, respecting local distinctiveness and complementary to their surroundings, and taking opportunity to enhance the AONB, as currently embraced by Local Plan Policy N7 Cannock Chase AONB.

SECTION 9. DELIVERING QUALITY DEVELOPMENT

Question 9.B. How should Plan Policies be developed to seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider nature recovery network?

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

Development Plans should play a key role in protecting and enhancing designated sites, habitats and species as part of efforts to reverse the long-term decline in nature globally and at home.

The nature recovery network for the borough will be an essential tool to support better spatial planning for nature recovery, by setting out priorities and opportunities for protecting and investing in nature. To be effective and ensure that the network is coherent and resilient to current and future pressures, it needs to (a) set quantitative targets of the minimum areas required to re-establish functioning ecosystems of priority habitats and species and (b) identify these areas spatially in the Local Plan so that they are protected from development and will deliver the greatest benefits for wildlife and people⁶.

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

⁶ NPPF (paragraph 174) makes clear that to protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

The existence of an AONB and the AONB Management Plan should be considered at the very outset of plan preparation, and its conservation and enhancement should influence all stages of the plan-making process and inform the approach of the Development Plan. In AONBs, separate policies – those in paragraph 172 – apply instead of the presumption in favour of granting permission. This is made clear in paragraph 11 and footnote 6 of the NPPF.

In response to policies and actions in the Management Plan, the AONB is preparing two pieces of guidance: Cannock Chase AONB Design Guide, and Guidance on Key Views and Development Visible in Views and the Setting of the AONB. To give these emerging documents weight in the planning process reference to them in the Local Plan is essential.

For information, while the whole of Cannock Chase AONB Management Plan should be taken into account in the preparation of the Local Plan, the following objectives and policies in the current [AONB Management Plan 2019 – 2024](#) are considered to be the most relevant:

Maintain the quality and distinctiveness of the AONB's landscape character (para 4.4).

Policy LCP1: Development proposals within the AONB should be of high quality design and environmental standards, respecting local distinctiveness, be complementary in form and scale with their surroundings, should take opportunities to enhance their setting⁸ and minimise their carbon footprint and negative impacts on the local environment.

Policy LCP2: The impact of traffic travelling through the Chase, and of highway management, on its tranquillity and other special qualities should be reduced where possible by encouraging alternative routes and by reducing speed, noise and air pollution.

Policy LCP6: The restoration and subsequent land use of working landscapes and land where a change of use is sought, should be informed by and sympathetic to the special qualities of the AONB.

Policy LCP7: The quality, location and usage of recreation infrastructure maintained by all major landowners in the Chase should be consistent and appropriate to landscape character.

Enhance the setting of the Chase within its wider urban and rural landscape (para 4.4)

Policy LCP8: Development and land management proposals in the area, which by virtue of their nature, size, scale, siting, materials or design can be considered to have a negative impact on the natural beauty and special qualities of Cannock Chase AONB, should be resisted.

Policy LCP9: In the immediate vicinity of the AONB, the character of the public realm (e.g. landscaping around roads and buildings, public lighting and signage) should be designed and maintained so that it reinforces and complements the landscape character and quality of the Chase and provides a welcoming experience for those entering the AONB.

Policy LCP10: Opportunities should be promoted to enhance the character and quality of the countryside and public open spaces surrounding the AONB so as to enhance the setting of the AONB, reduce its isolation and create strong visual and aesthetic links with surrounding landscapes.

Improve conditions for nature in the Chase (para 5.5)

Policy WN1: The international significance of the Cannock Chase Special Area of Conservation (SAC), and the fragility and needs of its biodiversity, should be fully taken into account in all forms of public policy and private practice that will affect the condition of the SAC

Enlarge and connect habitats (para 5.5)

Policy WN8: Explore and develop opportunities to restore heathland from forestry plantations in the Chase.

Policy WN9: The AONB Partnership will actively support opportunities to build connected networks of wildlife sites extending beyond the AONB and improve landscape permeability, as a means of enhancing the resilience and viability of wildlife populations currently concentrated in the Chase.

Policy WN10: The AONB Partnership will take a leading role in supporting and facilitating practical delivery of biodiversity net gain, through measures such as Section 106 and the Community Infrastructure Levy, to provide suitable areas of new habitat that enhance the resilience and recovery of wildlife living in the AONB.

Conserve the Chase's historic environment (para 6.2)

Policy HC2: Work with landowners, managers, decision makers and local communities to positively manage the historic environment to ensure its successful conservation and enhancement.

Treading lightly in the Chase (para 7.3)

Policy EE1: Wherever possible, recreational activity should be moved away from the most sensitive parts of the AONB, ensuring that suitable measures are in place to reduce the negative impacts of an increase in visitors (both within and outside the AONB boundary).

Policy EE2: Improvements to the quality and connectivity of existing, and development of new, Green Infrastructure and Open Space outside of the AONB boundary should be supported. This should involve working with Partners to help reduce recreational and visitor pressure within the AONB.

A greener experience (para 7.3)

Policy EE4: High qualities of visitor infrastructure and provision, using best practice environmental design standards, should be adopted throughout the AONB, including a common approach to branding, interpretation and the reduction of visual clutter
Policy EE6: The use of alternative means of transport by visitors to the Chase should be explored and actively promoted.

Natural benefits for the community (para 8.3)

Policy CB1: Ways should be developed to ensure that the natural benefits that the AONB delivers are fully taken advantage of by local communities and help meet the needs of all members of those communities, whilst conserving and enhancing the special qualities of the AONB.

Businesses supporting the special qualities (para 8.3)

Policy CB4: Local businesses should be encouraged and supported to develop high quality products and services, and growth and innovation, that support the special qualities and the AONB brand.

I trust you find these comments helpful

Yours sincerely



Julia Banbury MA CMLI
AONB Landscape Planning Officer

Sport England comments

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

It is noted that a Playing Pitch Strategy (PPS) has been undertaken by the authority which is welcomed. As part of keeping the PPS up to date the authority should undertake an annual review of the strategy and action plan (Stage E as per Sport England PPS guidance) this will help to establish if the PPS recommendations are still robust or if there is significant change in circumstance which requires a review of the PPS in its entirety (significant changes in population growth figures or change in local plan timeframe) or an individual sport section (increase in participation rates/or closure of a significant site).

Further to the above the location of the proposal new town settlement has not factored into the Indoor Sport Facilities and Playing Pitch Strategy, therefore as previously discussed with the LPA an update of the strategies would need to be undertaken to establish the impact of the demand generated from the development.

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

The vision and objective should be more implicit in embodying the Council's corporate objective of "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 wellbeing."

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

It is considered that the spatially based approach to objections could lead to a level of duplication or fail to pick up objectives which would equally apply to the area.

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

Sport England supports reference to the Active Design Guidance within the Design SPD though the 10 principles should be expanded within the SPD, to provide greater clarity as to what is required i.e. size and specification of footpaths to cater for both pedestrian and cycling; promotion of co – location of services; and promotion of a network multi functional greenspaces.

Question 9.N

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

The Council have a recently adopted Playing Pitch Strategy (PPS). The PPS includes a New Development Calculator tool which helps establish playing pitch demand generated from residential developments. Depending on the finding of the PPS the demand identified by the calculator could be met by improving existing sites (drainage, maintenance and ancillary provision) and/or new playing fields. This approach utilises the evidence base which informs the local plan as opposed to applying a generic standard for sports facilities. Therefore, Sport England does not support the use of the Fields in Trust standards.

Question 9.O Should the Council:

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

Sport England, in line with NPPF paragraph 96, supports the undertaking of the indoor and outdoors strategies which identifies specific needs required to be accommodated within the Local Plan. This could be achieved by the local plan containing policies advocating the application of the New Development Calculator / Sports Facilities Calculator and/or specific site allocations supported by the use of the calculator to inform contribution figures from development sites to deliver the identified facilities.

It is noted that the consultation document at paragraphs 9.54 and 9.55 identifies shortfalls in provision. However, it should be noted that the PPS identifies shortfalls in provision on a sub area basis which should be utilised to inform future demand as opposed to taking account over provision within another locality, which is the approach taken within the consultation document. Further to this the shortfalls identified for football are match equivalent sessions not number of pitches as stated. The PPS also identifies current and future shortfalls within cricket (adult and junior cricket) and rugby provision, which should be identified within the local plan. Clarity is also sought as to the size of sports hall required and its specification i.e. to accord with Sport England sports hall design and layout guidance <https://direct.sportengland.org/media/4330/sports-halls-design-and-layouts-2012.pdf>.

Question 11.A a. Should the New Local Plan 2020-2040 continue to address health and wellbeing via relevant associated policies in the way the currently adopted plan does? b. Or should an alternative approach to the integration of health and wellbeing issues into the New Stafford Borough Local Plan be adopted? c. Where should references to Health and Wellbeing be strengthened in the New Stafford Borough Local Plan?

Sport England welcomes reference to Active Design Guidance within the current Local Plan which should also be incorporated within the new local plan. It is considered that there should be overarching health and well being policy though it is acknowledged that there will be a number of other cross cutting policies within the plan which will help implement the objective of creating a healthy and physically active community.

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

Sport England advocates that the Plan should support the prioritisation of active travel through safe, integrated walking and cycling routes.

**STAFFORD BOROUGH LOCAL PLAN 2020 - 2040
ISSUES AND OPTIONS CONSULTATION
STC RESPONSE**

Please find below Stone Town Council's responses to the 'Issues and Options Consultation'.

4 How Many New Homes Do We Need?

4.1. We advocate Scenario G, the CE baseline with 50% uplift in the number of future jobs – with the uplift due to expected developments in and around Stafford - and an adjustment to account for young people forming households at a higher rate than recent trends in response to Government policy to encourage first time home-owners. This implies a total of 11,939 new homes across the Borough during the period 2020-2040.

5 How Many New Homes Are Already Planned?

5.2 We advocate discounting the 6,000 un-built new homes for which planning permission currently exists or for which land has already been identified. This results in the need to identify land for a further 5,939 new homes across the Borough during the plan period.

6 Where Should The New Homes Be Located?

6.1 Our preferred option is Growth Option 5 that requires a combination of dispersal across the amended settlement hierarchy combined with one or more garden communities. This will enable the development of sustainable, purpose built communities with the necessary infrastructure and employment - and importantly, the retention of the essential character of existing settlements.

6.2 We are concerned that Growth Option 6 will lead to ribbon development that would damage the character of existing settlements.

6.3 See section 14 for comments on the SHELAAs relevant to Stone.

7 What Is The new Settlement Hierarchy?

7.1 We support the proposed hierarchy including Tier 3.

8 What About The Green Belt Settlements?

8.1 We support the Green Belt Settlements and specifically the protection afforded to green belt North and North-East of Stone which will protect the essential character of both Stone and the adjoining smaller settlements.

9 What Are Garden Communities?

9.1 We very much welcome the principle of these developments in order to make productive use of available land and to protect the character of existing settlements from the threat of over-development. This assumes, of course, that the necessary infrastructure, employment and facilities are in place to ensure sustainability.

10 What Are The Options For A new Garden Community In Stafford Borough?

10.1 We very much favour the development of 2 garden communities: at Hixon (2,750 new dwellings) and at Gnosall/Haughton (3,250 new dwellings). We note that these provide between them the opportunity for 6,000 new homes together with supporting employment.

10.2 We note the opportunity for a 'super-size' garden community at Meecebrook but have considerable reservations about its size and the cost of vital improvements in infrastructure necessary to provide direct links North and South to the M6 - and increased transport capacity along the B5026 Eccleshall Road, at the A34 roundabout and along Yarnfield Lane (both of which will be under considerable pressure from HS2 construction traffic for several years) in order to prevent Stone becoming a major traffic bottleneck.

10.3 We do not support the opportunities at Redhill and Seighford as they fail in our opinion to ensure a clear distinction between settlements. We note that Weston has environmental constraints and potential issues with size and sustainability.

11 How Much Employment Land Do We Need?

11.1 We advocate Scenario C in line with our comments re new homes. This implies 8,900 new jobs and 78.56 HA of employment land. We note that the garden communities at the land between Gnosall & Haughton and Hixon in combination are expected to provide 3500 of those jobs leaving 5400 required from existing settlements.

12 Where Could New Workplaces Be Built?

12.1 Under Scenario C outlined in 11 above and using table 5.10, we anticipate Stone and immediate surroundings providing 405 jobs on 5.9HA of employment land based on it taking 7.5% of the remaining share. (7.5% being the mean value as indicated in table 5.10)

12.2 Virtually no land is available within currently designated employment areas in Stone, we note, however, that Meaford is still relatively undeveloped and can support many of the additional jobs required.

12.3 If further employment land at Stone is required, an option is to extend further South along the A34 beyond the new JLR car storage facility though this is not desirable as it moves the settlement further towards Stafford and well beyond a natural boundary formed by the A34 and A51 junction.

12.4 We note that the recently developed JLR facility utilises 21 HA of land but employs less than 100 people which we regard as a very poor use of employment land. In order to avoid such a situation recurring, any new land allocated in and around Stone should be designated for B1/B2 development only (light industrial/offices).

13 What Other Options Does The Consultation Cover?

Sustainability and Climate Change

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?

Yes, it should.

In line with the planning horizon of 50 to 100 years stated in this document, the plan should include a requirement for future-proofing in all developments, to include:

The integration of appropriate forms of renewable energy in all developments.

Implementation of advanced insulation such as triple glazing, solar panels and water saving units.

Implementation of energy saving technology in all developments.

Reduction of water run-off from developments. Reduction in hard landscaping

Implement government plan to eradicate gas boilers.

Use of environmental building techniques and materials.

Electric car charging points for all developments, residential and business.

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

The plan should aim to do more than just mitigate. Mitigation suggests that developers only have to offset. The plan should require mitigation plus 50%.

Include stringent requirements to protect existing trees, hedgerows and green spaces. Where protection is not possible then mitigation must be equal + 50%.

Where possible, mature hedges and trees should be transplanted rather than replaced with saplings.

Enforcement of mitigation is vital both in the planning stage, at the time of development and in the subsequent years. Don't let developers off the hook.

Plan for a large-scale programme of rewilding. Collaboration with farmers, landowners and agencies to develop rewilding of agricultural land. Require developers to contribute to the costs and subsidies of rewilding to offset the natural environment they are building on.

No building on floodplains.

Question 4.B Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?

Renewable energy production is vital but only as part of an integrated plan to ensure the reduction in energy usage.

All renewable energy programmes must be subject to rigorous feasibility studies to ensure the right choices are made for efficient, long term energy production.

Wind power. Consider a planned wind farm rather than the random installation of single turbines by individual landowners.

Solar energy. Collaborate with landowners to create solar farms but with measures for natural screening. Implement solar in all new build.

Geo-Thermal: Commission a feasibility study for geo thermal/ground heat source energy systems.

Carbon capture

Bio mass

Hydro: Can the rivers in our borough be harnessed for energy production?

Ambition: Make Stafford Borough a nationally recognised location for energy transformation.

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?

Yes, subject to it being the most efficient method to supply energy rather than it being a stipulation that the developer pays lip service too.

Question 4.D Should the council allocate sites for wind energy developments in the Local Plan? If so, where should they be located?

Yes, but subject to a complete study to prove viability, effectiveness and suitability.

Wind farms should be located where they are the most effective for production, but also the least effect on the resident population and ecology

M6 corridor? Industrial estates? Remote farmland?

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

Yes, it should.

Use waste-water recycling for irrigation purposes

Rain-water collection mandatory for all developments

Greater protection from agricultural run-off into the Borough's waterways.

Environmental Quality

Question 10.A

The current adopted Plan for Stafford Borough does not include 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?

Yes, it should.

And include regulations to require retro-fitting of infrastructure in completed developments.

Produce a policy on how to deal with installing recharging facilities for the residents of terraced streets and blocks of flats.

Ensure that the introduction of hydrogen powered vehicles is considered in any infrastructure developments.

b) Ensure all major development is accessible by regular public transport?

Yes. This is imperative and should be part of an integrated public transport system for existing developments and rural area.

Feasibility studies are needed to ensure that the right transport systems are integrated to suit a location and demographic. Make public transport a compelling option to get people out of their cars.

Buses should be non-polluting.

Larger new developments such as Garden Communities must incorporate plans for cycle lanes and cycle super-highways between the development and towns or places of work.

Example, it is impossible to cycle safely between Stone and Stafford.

c) Enforce Air Quality Management Zones around areas of notable biodiversity importance?

Yes.

Of equal, if not greater importance is the need for measures to improve air quality along road corridors and pedestrian hot spots such as schools.

d) Employ any further methods which you consider will aid in the improvement of air quality within the borough?

Policy to implement pollution reduction schemes that reduce vehicle pollution in hotspots such as schools and hospitals. E.g. Green screens.

There is an urgent need to improve traffic flow in congested areas to reduce the amount of stationary and slow-moving traffic.

Examples:

The splitter island on Christchurch Way in Stone creates large-scale congestion and subsequent pollution in a heavily pedestrianised area. The footpaths affected are also a major route for schoolchildren. Fixing this issue is an important and easy win.

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?

Yes.

However, prevention is better than cure so avoid any development that produces NO₂. Prevent the need for mitigation and, if the development is essential, then impose high standards of mitigation and ensure these are enforced.

Waste and Recycling

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?

Yes absolutely necessary.

b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?

Yes absolutely necessary.

c) Employ any further measures to increase the sustainable and efficient disposal of waste.

Yes.

Further measures must include policies that encourage manufacturers, suppliers and retailers to reduce the amount of packaging they use and move to recyclable and degradable packaging.

Deploy more publicity, guidance and incentives to the population.

Landscape Character and Historic Environment

We would like to see a more rigorous enforcement of planning rules particularly in relation to the Stone Conservation Area.

Current Plan Policies and Use Classes.

We propose a review of current policies to ensure that they meet future needs and would welcome confirmation that this is the intention of the LPA as part of the Plan formulation. (C5 Rural Exception Policy is a case in point).

We also advocate a review of Use Classes most appropriate to the Town Centre and Conservation Area and the restrictions for moving between classes. In particular we are concerned about the ease of acquisition of A5 use within the Conservation Area.

Local Green Space, play space and sports facilities.

We note that the Stone Neighbourhood Plan, due for examination later in the year, identifies local green spaces and we advocate the recognition of these within the Plan. The Stone Leisure Plan Phase 1 is now complete and we await the implementation of Phase 2 at the earliest opportunity.

Health and Wellbeing

Question 11.A

a. Should the New Local Plan 2020-2040 continue to address health and wellbeing via relevant associated policies in the way the currently adopted plan does?

No

b. Or should an alternative approach to the integration of health and wellbeing issues into the New Stafford Borough Local Plan be adopted?

Yes.

Health and Wellbeing should be a priority consideration when deciding where development takes place in terms of access to health care, the natural environment, community and exercise.

Requiring developments to integrate measures that improve mental health, fitness and general wellbeing will have a positive effect in many areas.

It improves the lives of the population, creates community well-being, improves mental health and life expectancy which in turn reduces pressure on health services.

The benefits are multiple, comprehensive and cost effective. The need is considerable.

c. Where should references to Health and Wellbeing be strengthened in the New Stafford Borough Local Plan?

In every section.

Question 11.B

If at Question 11.A b you considered that the Council should adopt an alternative approach to the integration of health and well-being issues into the New Local Plan which potential model would you advocate? (see Para 11.10: Models A; B; C) What is your reasoning for this answer?

On the evidence provided in this document our recommendation is for Model A. This is because the Local Plan needs to have regulations that address health and well-being throughout the plan.

There should be over-arching principles and requirements that are adapted into each section of the plan. Impact assessments could lead to developers having grounds to argue the requirements and to attempt to reduce the measures.

Planning Policies in the new plan must underwrite improvements in health and well-being. Many councils have policies restricting approval of use classes promoting e.g. fast

food, by limiting numbers and or location of outlets. This is particularly important for children and vulnerable adults.

Regulation and enforcement are needed to a high level to ensure the developments of the future are fit for purpose in terms of health and wellbeing for the next 100 years. You only get one chance to plan a development correctly.

Equally important is that the areas that are currently deprived should have policy directed towards urgent action.

Do you consider that there is an alternative approach to this issue that might be considered? If so please describe/give an example.

Health and Wellbeing should be on an equal priority to Climate and Environment. All elements of the Local Plan should have these two categories as priority areas for consideration, regulation and enforcement in all developments.

We wish to note the potential adverse impact of A5 Use Class outlets on Health and Wellbeing and wish the LPA to restrict their development within the town centre in line with the actions of many other LPA's.

We wish to note that a new health centre was expected in the current Plan but has not materialised.

Sustainable Parking and Transport

The document contains the usual well-motivated and environmentally-sensitive general comments and aspirations regarding reducing car usage and encouraging cycling and walking. However, apart from the predictable suggestion that better public transport (i.e buses) should be made available there is only a superficial analysis of transport needs and nothing innovative (electric vehicles can no longer be considered 'innovative'). Moreover, while the document recognises the challenges faced by those who live in rural locations ("In these areas the Borough Council will seek to reduce the need for long distance commuting by providing adequate employment opportunities and retention of local facilities in rural areas."), there no hint of how that commendable aspiration could begin to be achieved.

Transport Needs Analysis

It is vital that a comprehensive transport needs analysis is completed to identify the categories and numbers of residents by their travel needs and capabilities and match those against the transport modes that are available or could be made available.

The categories into which residents would fall depends on such factors as where they live, their personal mobility, their own transport resources and so on. Here is a suggested initial list:

Location	Town Centre Stone within 1 mile of Town Centre Stone over 1 mile of Town Centre Stone hinterland
Mobility	Fit and active Slower but still fit Limited mobility
Wealth	Comfortable (and above) Getting by Basic wages/benefits
Resources	2+-car family 1 car family Single occupier with a car Cycle Electric scooter Mobility scooter No vehicle
Modes	Walk Cycle Electric Scooter Mobility scooter Car Bus Taxi
Age	Adult (18 +) Youth (14 - 17) Child (13 and under)

Only once the needs have been identified, assessed and analysed can appropriate solutions be considered. A bus is a solution but may not necessarily be the appropriate solution to a specific need. For example, for an elderly person with mobility problems living over one mile from Stone town centre and wanting to go shopping the only realistic transport solution would be a taxi.

Transport Modes

Walking – Walking is satisfactory for those with a particular minimum level of fitness but has limitations with regard to load carrying, is sensitive to weather conditions, and is impractical for residents in rural areas.

Cycles (bicycles, tricycles etc) – Cycling can also be satisfactory for those with a particular minimum level of fitness but also has limitations with regard to load carrying and is sensitive to weather conditions. Their use is helped by the availability of dedicated cycle lanes. However, cycles are impractical for most residents in rural areas. Motor cycles have not been considered in this response

Electric Scooters – These are becoming increasingly popular and may be more suitable for those with limited mobility compared to conventional cycles. While being a practical option for those living within the town (depending on range) they are impractical for those living in rural areas.

Mobility Scooters – These provide more load carrying capacity than cycles or electric scooters and can also provide some protection from the elements. They are a practical option for those living within the town (depending on range) but impractical for those living in rural areas.

Private Cars – This is the most flexible and convenient mode, hence its dominance. The environmental impact can be mitigated by switching to electric vehicles (and, in the future, hydrogen power) supported by the provision of public electric charging points. However, the use of cars creates a need for parking which needs to be addressed constructively rather than automatically reaching for controls and sanctions. Fortunately, Stone has sufficient public car parking spaces for normal demands but opportunities need to be identified to increase provision. Adequate car parking is essential to the future health of the local economy. The subject of car parking charges is particularly contentious and such charges are a 'flat tax' hurting proportionally harder those on lower incomes than those who are better-off.

Buses – Buses are often mistakenly believed to be the solution to all public transport needs. Buses may be appropriate but they run on fixed routes and timetables with consequent inflexibility, have capacity constraints and are not suitable for those with certain mobility problems. The provision of buses may require significant subsidy and thus may not be economically justifiable

Taxi – Taxis provide the flexibility of private cars, suit those with mobility limitations and are not sensitive to weather. However, taxis are not always available and their costs may be prohibitive to some. Nevertheless, the Borough Council could take an initiative to encourage the further availability of private taxis and introduce a targeted subsidy for those who need support.

Trains – Trains are a remarkable omission from the plan other than main-line trains. The success of the train services reintroduced at Stone Station indicates further potential. For example, with the huge residential developments to the south of Stone over recent years the possibility of resurrecting Aston-by-Stone station (closed in 1947) and the restoration of the platforms on the Trent Valley Line at Stone station should be examined along with a stopping service between Rugeley and Stoke. The examination would need to take into account line capacity (believed to adequate), a small increase to the disruption of road traffic at the three level crossings in the Town and any impact from HS2 (it is believed that HS2 traffic will not normally be using the Trent Valley Line between Rugeley and Stone).

14 When Will I Have A Chance To Comment on Development Sites?

14.1 We note that the opportunity to comment fully on the SHELAA potential development sites in and around Stone will come later this year as part of the next stage of consultation on the Plan. We wish to take the opportunity to comment as follows on the relevant sites identified in the SHELAA.

14.2 Our recommended new homes model requires 11,939 new homes during the period 2020-2040 that should be discounted by the 6,000 un-built homes for which permission has been received or land allocated, leaving a requirement for 5,939 homes which can be satisfied via the recommended garden communities.

14.3 Stone should therefore be allocated only small scale development and infill which, given the need to 'digest' recent large scale development, much of which is currently still under development or awaited, will help to protect the essential character of the settlement.

14.4 We have reviewed each of the SHELAA sites and propose developments providing up to an additional 134 new homes. See the following comments:

STO01. There is existing permission for a mix of retail and 20 homes on the North end of this site and counted within the 6,000 un-built. The South end of the site beyond where it meets the A51 appears too narrow to enable development. According to existing metrics (30 dwellings per HA) there may be room for an additional 30 homes up to the point of the A51 junction.

STO02. This is logical for development of 31 homes though a gas pipeline running the length of the East of the site might restrict those numbers. Access to this site would therefore need to be off either an improved Aston Link Road or the A51. Our support for this development would be contingent upon the widening of Aston Link Road and/or the creation of a remodelled and safer road junction to the A51

STO03. This is not supported and has failed at application previously.

STO04. This is not supported, is in the flood zone and is designated as green infrastructure.

STO05. This is incorrectly identified as green infrastructure. It is available and a brownfield site. Its development is supported. 22 homes.

STO06. The numbers of new homes far exceeds that required under our recommended scenario and the site is not viable without a road access built from the A51 and under the WCML.

STO07. Walton has undergone - and is currently undergoing - significant development that is changing its nature and is considered barely sustainable. During the previous Examination the HMI commented negatively on the volume of development in Walton. This site is not necessary to meet required numbers of new homes and should not be developed.

STO08/10. This site is not supported. We support SBC's comments. It has previously been rejected.

STO09. This site is supported but should be dedicated to new homes and offices rather than the proposed mix. It should therefore support at least 20 homes.

STO11. This site is not supported and we note that it is in the flood zone.

STO12. This site is supported but access over the Church Street rail crossing is a limiting factor that gives rise to concern and will require careful consideration. 31 homes.

STO13. This site is not supported due to its development worsening the current access problems caused by the Uttoxeter Road level crossing.

STO14. Walton has already undergone and is indeed currently undergoing significant development that is changing its nature and is considered barely sustainable. During the previous Examination the HMI commented negatively on the volume of development allocated to Walton. Its size is far greater than required under our recommended scenario. This site is not necessary to meet the required numbers of new homes and should not be developed.

STO15. This site is not supported.

End of Submission

BRADLEY PARISH COUNCIL EMAIL RESPONSE – 27 MARCH 2020

From: Bradley Parish Council [REDACTED]
Sent: 27 March 2020 16:09
To: List-ForwardPlanning-SBC
Subject: Bradley.

Dear Sirs.

After some discussion of the new plan 2020-2040 at our recent Parish Council Meeting, concern was expressed at the viability of the new plan and the link with the Highways department. Bradley is a good example of this.

Our infrastructure and road network is unable to cope with the traffic in the area. Wells farm and Littywood farm have in our opinion outgrown the local road network. To such a degree that local residents are calling for a by pass around the village.

The parish council are in full agreement with that idea. The rural road network is frankly becoming a mess, with rapid erosion due to oversized vehicles and potholes that are making some roads impassable. Lets get the network right before we increase development.

Stewart Wilkes. Clerk. Bradley Parish Council.

Hixon Neighbourhood Plan Steering Group responds to the Stafford Borough Council Local Plan Review 2020-2040 as follows. The Steering Group comments are highlighted in grey.

March 30th 2020

New Garden Settlements

On page 54 of the In the Issues and options document, the Hixon Airfield site is described as 'unused'. The undeveloped areas of the airfield are actually agricultural land.

On page 63, the concept of a Garden Settlement on Hixon airfield would be an 'urban extension.' The airfield site is remote from Hixon village.

On page 125 of the SBC Strategic Development Site Options, the Hixon Airfield site is incorrectly designated as a "Recognised Industrial Estate in the Local Plan." The site is outside the Recognised Industrial Estate Boundary as defined in the current Plan for Stafford and the adopted Hixon Neighbourhood Plan.

Hixon Neighbourhood Plan Steering Group Response: A new settlement on the edge of Hixon would seriously affect the village and surrounding area. It would effectively be creating a 'dual' village with Hixon becoming an outlier of the new settlement, lacking integration between the two halves. It would have a major adverse impact in terms of landscape setting and traffic generation in particular. It is doubtful whether public transport would play a significant role, as people reduce their carbon emissions by switching to electric cars in the future. The provision of new/improved services and facilities which could be used by Hixon residents is unlikely to outweigh the negative aspects of such development for the majority of local people.

Hixon Neighbourhood Plan Steering Group objects to the inclusion of land on Hixon Airfield for a Garden Community. The Steering Group also objects to land allocations off the A518 (Uttoxeter Road) at Weston.

SHELAA sites in Hixon (housing and employment land)

Hixon Neighbourhood Plan Steering Group Response: objects to the inclusion of sites for housing development or employment land outside the settlement boundary and recognised industrial estate boundaries as defined in the Plan for Stafford and the adopted Hixon Neighbourhood Plan. Although the selection of sites to be formally allocated for development is some way off, none should be taken forward in advance of a review of the Hixon Neighbourhood Plan, which should be central to the Local Plan Review process.

Section 3 Stafford Borough Council Vision and Objectives

Hixon Neighbourhood Plan Steering Group Response: Although it is important to have transparency of information around the Local Plan Review, the amount and detail of information presented in the Local Plan Review Issues & Options is likely to be off-putting for many people. The Non-Technical Summary is useful but a little too 'thin'. The amount of documentation will only increase as the Review progresses.

Stafford Borough Council has committed to the Government's stated Policy for Carbon Neutrality by 2050."

Hixon Neighbourhood Plan Steering Group supports a holistic strategy to enable the raft of inter-relating policies to address the significant climate change and its consequences.

Key Objectives - Areas outside of Stafford & Stone

"Provide for high quality new small scale housing development at appropriate villages that reflects their distinctive local character. Deliver sensitive additional facilities to provide an improved level of local services appropriate to settlements that reduces the need to travel and is in keeping with the local character, the historic environment and the rural setting. Protecting designated sites, including the Special Areas of Conservation. New open space, sport and recreational facilities to meet the needs of the community, including through increased multi-use provision such as community halls."

Hixon Neighbourhood Plan Steering Group agrees with these objectives

Section 4 Sustainability and Climate Change

"It is important to ensure that the new Local Plan for Stafford Borough guarantees that all development delivered within the borough contributes to the creation of a greener, more sustainable and more resilient environment. This can be achieved through embedding sustainability in the design of developments. By guaranteeing high levels of energy efficiency and ensuring access to renewable energy sources in all new development, a reduction in greenhouse gas emissions will be achieved."

Hixon Neighbourhood Plan Steering Group agrees with these objectives.

Section 5 Development Strategy

Hixon Neighbourhood Plan Steering Group Response: The different spatial development scenarios outlined in this section are very useful and it is pleasing to see an acknowledgement that the 'orthodox' Key Settlement approach may have been taken too far.

Too often the result of this approach has been the transformation of key villages into towns and the loss of many, if not all, community services and facilities in the other villages. The economies of scale in provision of infrastructure and potential reductions in travel using the Key Settlement approach must be weighed against the loss of 'community' in the rural areas.

In practice, a mix of spatial development scenarios, with a greater emphasis on dispersal of development to smaller settlements may be the preferred approach. In this context Hixon Neighbourhood Plan Steering Group agrees with Hixon Parish Council proposal to setting a limit on the proportion of new housing to be built in comparison to the number of existing dwellings. 15% as an absolute maximum for Hixon and should preferably be less than this, especially bearing in mind the amount of growth Hixon has experienced in recent years. It would still mean a significant number of houses being added to the village.

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

Hixon Neighbourhood Plan Steering Group suggests a housing requirement figure of 500 units per year. The developments to be of appropriate scale to the locality and spread across Stafford Borough.

5.16 *"It is recognised that some of the Key Service Villages have received a disproportionate amount of housing than others. The northern built up areas of the Borough are not properly recognised in the currently adopted Plan for Stafford Borough. Therefore, despite these settlements being sustainable locations with access to a wide range of services, facilities and public transport connections, planning applications for the development and redevelopment of land in these locations are not supported in the adopted Plan. It is therefore important that these settlements are properly recognised in the revised Settlement Hierarchy."*

Hixon Neighbourhood Plan Steering Group agrees with this revised approach.

5.46 *This Option would propose a growth distribution as follows: • Stafford 50-70% • Stone 10-20% • North Staffordshire Urban Areas 5% • Large Settlements 10-20% • Medium Settlements 5-10% • Small Settlements 5-10%*

Hixon Neighbourhood Plan Steering Group Response: Agree but no one settlement area should have new housing numbers above 15% of current housing total.

Section 7 Delivering Town Centres that address Future Needs.

"Planning policies should support the role of town centres at the heart of local communities through a positive approach to growth, management and future changes."

Hixon Neighbourhood Plan Steering Group supports this objective

8.7 Brownfield land

The use of brownfield land for development means that the pressure placed on greenfield land is reduced, preserving the countryside and landscape of an area. The currently adopted Plan for Stafford Borough places preference on the development of brownfield land over greenfield land. Should the council continue to encourage the development of brownfield land over greenfield land?

Hixon Neighbourhood Plan Steering Group supports the development of brownfield sites over greenfield land.

8.1 *Should the Council consider a policy requiring bungalows to be delivered on all major developments?*

Hixon Neighbourhood Plan Steering Group Response: It is pleasing to see that SBC has taken up the issue of the need for more bungalows. Hixon Neighbourhood Plan Policy No.2 was ahead of the curve in placing a requirement of a minimum figure of 20% bungalows on new housing developments above ten units.

8.33. *“The Self-Build and Custom Housebuilding Act of 2015 mandates that all Local Planning Authorities keep a register of parties interested in designing and building their own homes in their locality. Self-build homes have the potential to raise design standards and diversify the housing stock of an area. Developments to provide 5% of plots as serviced plots available for self and custom build homes.”*

Hixon Neighbourhood Plan Policy No.3 was proactive in proposing self-build sites on new housing developments. Hixon Neighbourhood Plan Steering Group supports a policy of more plots for the purpose of self-build throughout the borough. 5% would be a reasonable starting point, although Policy No.3 of the adopted Hixon Neighbourhood Plan proposes 10% self-build plots.

Although the numbers may be small in the context of a ‘low growth’ option for Hixon, self-build units will add some diversity to the accommodation and design of dwellings in the community.

Green and Blue Infrastructure

“There are a number of sites in the Borough that are internationally designated. The “Natura 2000 network” consists of sites that are of exceptional importance for the protection of rare, endangered or vulnerable natural habitats and species within the European Community. These sites comprise of (sic) Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) within Stafford Borough the international designations are: Special Areas of Conservation: Cannock Chase, Pasturefields Saltmarsh, Motte Meadows; and Chartley Moss.”

Hixon Neighbourhood Plan Steering Group supports this objective

The Importance of Tree Stock

9.24 *The currently adopted Plan for Stafford Borough does not provide a specific policy to maintain and enhance tree cover in the area. It is the ambition of the Council to take the necessary steps to ensure that the realisation of this objective is enabled by the new Local Plan. The existing tree stock within the Borough will be offered adequate protection from removal or damage and that any development which provides an opportunity to increase tree cover on site.*

Hixon Neighbourhood Plan Steering Group supports this objective

Leisure facilities

“Stafford Borough Council should seek to designate land within the New Local Plan 2020-2040 to address the Borough-wide shortage of new sporting facilities and identify within the New Local Plan 2020-2040 a site in which a new swimming pool should be developed.”

Hixon Neighbourhood Plan Steering Group supports this objective



Public Transport

“Much of the Borough’s population outside of Stafford and Stone are living and / or working in remote rural areas where the choices of transportation modes are currently limited and the use of the private car is generally a necessity. In these areas the Borough Council will seek to reduce the need for long distance commuting by providing adequate employment opportunities and retention of local facilities in rural areas.”

Hixon Neighbourhood Plan Steering Group Response: During the Hixon Neighbourhood Plan consultation process, there was a thorough analysis of where Hixon residents travelled to places of work or education. There was also a questionnaire to local businesses to identify where their employees lived. The analysis revealed that 90% of Hixon residents who travelled to a place of work/education travelled out of Hixon.

By contrast, 90% of employees at the three local industrial estates lived outside of Hixon. Almost all used private car or van to travel to work because there is no viable public transport.

It is a falsehood to link housing with employment opportunities if those employment opportunities do not offer appropriate jobs.

It is naïve to think that by simply allocating residential and employment development in the same vicinity it will reduce the amount of journey to work travel to a significant degree. The Hixon Neighbourhood Plan surveys demonstrated this. The employment requirements of local residents and the skills required by local employers are simply too diverse to be able to match these through land allocations, even where use classes to be permitted are specified by planning conditions.

Hixon Neighbourhood Plan Steering Group trusts the above responses will be taken into consideration as the Local Plan Review 2020-2040 process unfolds.

Hixon Parish Council Response to Stafford Borough Council Local Plan Review 2020-2040 March 30th 2020

New Garden Settlements

Stafford Borough is considering a number (7) of potential developments for a new garden settlement(s). The sites are at Gnosall, Haughton, Seighford, Redhill, Cold Meece, Hixon and Weston.

The Hixon site extends to 107 hectares with a potential for 2,750 houses, while the Weston sites add up to 125 hectares with a potential for 2,250 to 2,750 properties. Cold Meece is the largest and possibly the preferred site.

Hixon Airfield is considered second most viable.

On page 54 of the In the Issues and options document, the Hixon Airfield site is described as '*unused*'. The undeveloped areas of the airfield are actually agricultural land.

On page 63, the concept of a Garden Settlement on Hixon airfield would be an '*urban extension*.' The airfield site is remote from Hixon village.

On page 125 of the SBC Strategic Development Site Options, the Hixon Airfield site is incorrectly designated as a "*Recognised Industrial Estate in the Local Plan*." The site is outside the Recognised Industrial Estate Boundary as defined in the current Plan for Stafford and the adopted Hixon Neighbourhood Plan.

Hixon Parish Council considered the potential for additional amenities and facilities from a large scale development on Hixon Airfield. The council looked at Planning Application 16/25450/OUT for 2,000 houses on a 143 hectare site at Beaconside in Stafford as a comparative site. 69 hectares will be developed at a density of 30 properties per hectare. However, only 12% of the properties will **be classed as "affordable" as compared to the normal agreed 30%.**

The application also includes provision of two "**Local Centres**", which will provide food and non-food Shops, a public house, health centre, 60-bedroom elderly Living Facility, Primary School (2 forms and costing £6,859,350), Secondary School (5 forms and costing £6,345,280), office space and green infrastructure. **There will be 14 hectares of 'adoptable' open spaces.** Stafford Borough Council Leisure Services will receive £1,831,147 to equip different play and recreational areas. **There will be a large number of balancing ponds and 'swales'.**

The site will be accessed by at least three new highway junctions.

HIXON PARISH COUNCIL RESPONSE:

If one or more of the Hixon and Weston sites were to be developed it would change the character of the area irrevocably.

Unlike the Beaconside site, which is essentially an extension of the Stafford town urban boundary, Hixon Airfield is located in the rural area and is bordered by three villages, each with their own distinct local character. The site would dwarf the villages of Hixon, Stowe-by-Chartley and Weston.

Hixon and Stowe-by-Chartley are not well served by public transport. Even with an improved level of public transport provision, it is highly unlikely that new residents would swap their car for public transport to access places of work in Stafford, Uttoxeter, Rugeley, Stone and beyond.

The Hixon Airfield site would generate huge numbers of vehicle movements along Stowe Lane and Bridge Lane in Stowe-by-Chartley that would feed onto other small rural roads.

Hixon Parish Council objects to the Local Plan Review 2020-2040 for the inclusion of land on Hixon Airfield for housing development of in excess of 2,000 properties. The possible benefit of more local amenities would not offset the harm to the character and distinctiveness of the area. Hixon Parish Council also objects to the inclusion of similar sites either side of the A518 (Uttoxeter Road) at Weston.

SHELAA sites in Hixon

Eight sites (excluding the Hixon Airfield site ID HIX07) totalling 22.3 hectares, are included in the latest SHELAA list for housing development in Hixon. The potential yield of properties is 422.

HIXON PARISH COUNCIL RESPONSE

All the sites are outside the settlement boundary as defined in the Plan for Stafford and the adopted Hixon Neighbourhood Plan.

For this reason, Hixon Parish Council objects to the inclusion of the following sites for housing development;

SITE ID HIX01; SITE ID HIX03; SITE ID HIX04; SITE ID HIX05; SITE ID HIX06; SITE ID HIX09; and SITE ID HIX10 ; and SITE ID HIX12

Three further sites, totalling 22.4 hectares, are included in the latest SHELAA list for employment land in Hixon.

HIXON PARISH COUNCIL RESPONSE

All the sites are outside the Recognised Industrial Estate boundaries as defined in the Plan for Stafford and the adopted Hixon Neighbourhood Plan.

For this reason, Hixon Parish Council objects to the inclusion of the following sites for employment use;

SITE ID HIX02; SITE ID HIX08 and SITE ID HIX11

Section 3 Stafford Borough Council Vision and Objectives

"The Vision, as expressed in the current Local Plan is now considered to be too long. It is therefore the intention that the New Local Plan should be guided by a new vision that is shorter and focussed on the aspects that the plan will seek to deliver over the period 2020-2040. The Council is minded to develop a Vision for the Plan that is more succinct and which conveys a strong sense of its development priorities for the next plan period."

Page 2 of 6

Hixon Parish Council agrees: New Local Plan should be shorter and more concise as the Hixon Neighbourhood Plan is. The Neighbourhood Plan

inspector noted that the Hixon Neighbourhood Plan was **"refreshingly concise and punchy."** More importantly, public consultation documents should be more user-friendly and easier to comprehend and respond to.

Section 4 Sustainability and Climate Change

"Stafford Borough Council has committed to the Government's stated Policy for Carbon Neutrality by 2050."

Hixon Parish Council supports a holistic strategy to enable the raft of inter-relating policies to address the significant climate change and its consequences.

Section 3 Key Objectives - Areas outside of Stafford & Stone

"Provide for high quality new small scale housing development at appropriate villages that reflects their distinctive local character. Deliver sensitive additional facilities to provide an improved level of local services appropriate to settlements that reduces the need to travel and is in keeping with the local character, the historic environment and the rural setting. Protecting designated sites, including the Special Areas of Conservation. New open space, sport and recreational facilities to meet the needs of the community, including through increased multi-use provision such as community halls."

Hixon Parish Council supports the above objectives in so far as seeking to deliver small scale developments that reflect local distinctiveness and provide an improved level of local services.

Section 4 Sustainability and Climate Change

"It is important to ensure that the new Local Plan for Stafford Borough guarantees that all development delivered within the borough contributes to the creation of a greener, more sustainable and more resilient environment. This can be achieved through embedding sustainability in the design of developments. By guaranteeing high levels of energy efficiency and ensuring access to renewable energy sources in all new development, a reduction in greenhouse gas emissions will be achieved."

Hixon Parish Council agrees with the above objectives

Section 5 Development Strategy

5.9 *"Depending on which methodology or Growth Scenario is used, a range of annual housing requirements is suggested. Using the Government's standard Local Housing Need methodology 2019-2029 a minimum Housing Requirement of 408 dwellings per annum (dpa) is indicated. It is normally Government's expectation that this figure will form a minimum unless exceptional circumstances can be demonstrated. Other methodologies suggest housing requirements ranging between 435 and 683 dpa or, between 489 and 746 dpa. For comparison the current Plan for Stafford Borough 2011-2031 requires 500 dpa to be delivered."*

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

5.16 *"It is recognised that some of the Key Service Villages have received a disproportionate amount of housing than others. The northern built up areas of the Borough are not properly recognised in the currently adopted Plan for Stafford Borough. Therefore, despite these settlements being sustainable locations with access to a wide range of services, facilities and public transport connections, planning applications for the development and redevelopment of land in these locations are not supported in the adopted Plan. It is therefore important that these settlements are properly recognised in the revised Settlement Hierarchy."*

Hixon Parish Council agrees with this proposed to distribute new developments more evenly throughout the Borough.

Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process."

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

5.46 *This Option would propose a growth distribution as follows: • Stafford 50-70% • Stone 10-20% • North Staffordshire Urban Areas 5% • Large Settlements 10-20% • Medium Settlements 5-10% • Small Settlements 5-10%*

Hixon Parish Council disagree with proposed growth distribution. North Staffordshire Urban Areas are closer and have easier access to the amenities and services within Stoke-on-Trent. Suggest North Staffordshire Urban Areas take 10% of growth distribution and large settlements 10-15% . No one settlement area should have new housing numbers above 15% of current housing total.

Section 7 Delivering Town Centres that address Future Needs.

"Planning policies should support the role of town centres at the heart of local communities through a positive approach to growth, management and future changes."

Hixon Parish Council supports this objective

8.7 *The use of brownfield land for development means that the pressure placed on greenfield land is reduced, preserving the countryside and landscape of an area. The currently adopted Plan for Stafford Borough places preference on the development of brownfield land over greenfield land. Should the council continue to encourage the development of brownfield land over greenfield land?*

Hixon Parish Council supports use of Brownfield sites rather than greenfield sites.



8.1 *"Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development? b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens? c) Is there a need for bungalows to be delivered in both urban and rural areas? d) Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?"*

Hixon Parish Council supports a policy requiring bungalows to be delivered on all development sites over ten units. Hixon Neighbourhood Plan Policy No.2 places a minimum figure of 20% bungalows as a requirement.

8.33 *"The Self-Build and Custom Housebuilding Act of 2015 mandates that all Local Planning Authorities keep a register of parties interested in designing and building their own homes in their locality. Self-build homes have the potential to raise design standards and diversify the housing stock of an area. Developments to provide 5% of plots as serviced plots available for self and custom build homes"*

Hixon Parish Council supports a policy of encouraging more plots for the purpose of self-build throughout the borough. 5% would be a reasonable starting point, although Policy No.3 of the adopted Hixon Neighbourhood Plan proposes 10% self-build plots

Section 9 Delivering Quality Development

Green and Blue Infrastructure

*"There are a number of sites in the Borough that are internationally designated. The "Natura 2000 network" consists of sites that are of exceptional importance for the protection of rare, endangered or vulnerable natural habitats and species within the European Community. These sites comprise of (sic) Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) within Stafford Borough the international designations are: Special Areas of Conservation: Cannock Chase, Pasturefields Saltmarsh, Motte Meadows; and **Chartley Moss.**"*

Hixon Parish Council supports the protection of these sites.

Section 9 The importance of Tree Stock

9.24 Protecting and Enhancing Tree Cover.

"The currently adopted Plan for Stafford Borough does not provide a specific policy to maintain and enhance tree cover in the area. It is the ambition of the Council to take the necessary steps to ensure that the realisation of this objective is enabled by the new Local Plan. The existing tree stock within the Borough will be offered adequate protection from removal or damage and that any development which provides an opportunity to increase tree cover on site."

Hixon Parish Council supports this objective.

Leisure facilities

"Stafford Borough Council should seek to designate land within the New Local Plan 2020-2040 to address the Borough-wide shortage of new sporting facilities and identify within the New Local Plan 2020-2040 a site in which a new swimming pool should be developed."

Hixon Parish Council agrees with these objectives

Section 12.6 Public Transport

"Much of the Borough's population outside of Stafford and Stone are living and / or working in remote rural areas where the choices of transportation modes are currently limited and the use of the private car is generally a necessity. In these areas the Borough Council will seek to reduce the need for long distance commuting by providing adequate employment opportunities and retention of local facilities in rural areas."

Hixon Parish Council response; During the Hixon Neighbourhood Plan consultation process there was a thorough analysis of where Hixon residents travelled to places of work or education. There was also a questionnaire to local businesses to report where their employees lived. The analysis revealed that 90% of Hixon residents who travelled to a place of work/education travelled out of Hixon. By contrast, 90% of employees at the three local industrial estates lived outside of Hixon. Almost all used private car or van to travel to work because there is no viable public transport. It is a falsehood to link housing with employment opportunities if those employment opportunities do not offer appropriate jobs.

Hixon Parish Council trusts the above comments and responses will be taken into consideration as the Local Plan Review 2020-2040 process unfolds.

31 March 2020

Our ref: Stafford BC 4

Dear Sir/Madam

Stafford Borough Local Plan 2020-2040 Issues & Options

Thank you for the opportunity to comment on your consultation, we have summarised our response within this document for your viewing. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

We have only provided answers to questions of which we see as relevant to our business.

Visions & Strategic Objectives

- Question 3C 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?
 - We support the increased effort in response to climate change which will adversely impact communities if not mitigated sufficiently through good design and consideration when developing the built environment.
 - One area we are particularly passionate about is resilience from extreme weather conditions and the use of green infrastructure. We welcome any future discussions around locating or suitability of green infrastructure and we strongly believe a multi-agency approach to implementing features maximises the benefits delivered.

Sustainability and Climate Change

- Question 4E Should the council implement a higher water standard than is specified in the statutory Building Regulations?
 - In line with the section on Water Efficiency later within this document we offer Developers a 100% discount on their clean water infrastructure charge should they opt for the tighter water efficiency target of 110litres/person/day.
 - The borough covers two of Severn Trent's water resources zones, Stafford and North Staffs. These zones have minimal water surplus and North Staffs is water stressed. We have plans in place through our WRMP (water resources management plan) to increase water supplies in this area to cope with the additional demand and the pressure on current water sources that the WFD (water framework directive) puts on the area.
 - We are strongly in favour of applying a tighter water efficiency target which will help support the water resources and environment in the local area. Achieving a target of 110 litres/head/day can be made at minimal cost to the home builder

and can be offset with our Infrastructure discount scheme. This can be made through fitting and appliances such as low flush toilets, water efficiency showers, washing machines and dishwashers.

- We believe that it is even feasible to achieve 80 l/hd/d without home owners having to change their behaviour. This can be achieved through greater water saving appliances, fittings and greywater recycling for use in toilets. More information on possible water savings can be found at www.thewatercalculator.org.uk.

The Development Strategy

- Question 5F (a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest.
 - The document displays a comprehensive array of spatial options.
- Question 5F (b) Are there any of these spatial scenarios that you feel we should avoid? If so, why?
 - Whilst lacking specific locations and detail, generally speaking; string settlement clusters and wheel settlement clusters are unfavourable. This is because although they appear to be individual and separate settlements more often their infrastructure is a single system which serves the largest of the settlements with the smaller ones connected into it. These connections from the smaller settlements can often be inundated from new development and require upsizing which can be both costly and disruptive. In particular the string settlement approach may produce a magnifying domino effect whereby the linkage between a string of settlements needs reviewing along the entire system length and may impact larger and more strategic assets.
- Question 5F(c) Which of these spatial scenarios (or a combination) do you consider is the best option?
 - Again speaking generally due to the lack of specific detail or circumstances there are several options which are typically favourable;
 - Intensification of Town and District Centres and in particular the redevelopment of brownfield sites is often a favourable scenario. These sites tend to have pre-existing infrastructure from their past use and therefore the local systems have some capacity to accommodate them. Green infrastructure deployment within intensified urban areas can provide urban cooling and flood resilience which aligns with your increased focus on climate change, such features would also enhance an area's biodiversity and amenity value.
 - New garden communities often require extensive amounts of new infrastructure and can pose major strategic challenges. That being said they also provide great opportunities to arrange infrastructure in an idealised way and with close collaboration on master planning and delivery they can be great ways to implement innovative new systems.
 - Dispersal of development can be favourable depending on its context and surrounding settlements; if spread in the right places existing infrastructure capacity can be utilised to avoid the need for additional capacity or accommodating works. However, if there is already limited capacity in the existing system(s) then dispersal of development can result in numerous different systems all requiring capacity works. Whilst this is feasible to deliver

it often poses a logistical challenge and requires a large proportion of planning/feasibility work to implement small piecemeal infrastructure improvements.

- Urban extensions and intensification around the edge of larger settlements allows us to focus our efforts on a specific region. Larger settlements often have some capacity which can be released by implementing long term strategic aspirations and can help us reshape our existing systems for the better. Occasionally they do involve some major engineering challenges and therefore close collaboration is encouraged to ensure there is no delay to implementing enabling infrastructure.
 - Building on all of the above, an evidence based approach to option selection is key and we believe the recent water cycle study is an important and useful output which can help shape your decision. The document will highlight strategic spatial challenges which would need to be addressed in order to deliver housing in certain areas. Capacity at certain wastewater treatment works, water resource quantities in certain zones or water quality on certain watercourses are all spatial constraints which should be carefully considered.
- Question 5G Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements? If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate?
 - As mentioned in the previous question we see large urban extensions and new garden settlements as major challenges which often require substantial engineering solutions. This does not make them unfavourable but they may require more input at an early stage to ensure they progress in a timely manner. We encourage close collaboration so that we can ascertain both confidence in the progression of an option (so that we are not undertaking abortive work) and input into both phasing and master planning. Larger strategic sites will often require a short term and long term infrastructure solution to mirror the number of dwellings which come online over time.
 - Regarding the sites identified, we are only familiar with Hixon airfield/Weston and Meecebrook. Both of these have had some high level consideration on our half however we would ask for more certainty around their progression so that we can increase our efforts accordingly. Should any of the other sites become allocations, in alignment with the above we welcome closer conversations about their feasibility, phasing and master-planning.
 - Question 5J What combination of the four factors should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process?
 - Utilising a discount for the crossover between plan periods and anticipated housing delivery within this time period would reduce the new plan's over commitment on housing target and thus reduce the scale of new development required, and pressures faced on existing infrastructure.
 - We encourage the Borough to utilise evidence from the water cycle study output to help justify a preferred option. The evidence could be used to determine where development could be accommodated with little impact on; water resource, water or wastewater infrastructure or environmental water quality. Should development be

proposed in an area flagged with specific risks then early engagement is key to ensure future delays to infrastructure provision do not occur.

- As mentioned above should a new garden village be proposed then we welcome involvement around phasing and master planning.

Delivering Housing

- Question 8A Should the council continue to encourage the development of brownfield land over greenfield land?
 - We are strongly favourable of redeveloping brownfield land over developing on greenfield.
 - Areas of existing or historic flood risk can be made more resilient with additional planning policies around redevelopment on brownfield sites. Asking developers on brownfield sites to discharge surface water at or below greenfield run-off rates can help deliver benefits to the wider community. We suggest this approach is considered for areas know to be at risk of flooding. The water cycle study and site specific outputs around surface water disposal may help guide where this type of policy may be most effective should you not wish to implement it across all sites.
 - Please refer to our comments on Question 5c bullet point one as it overlaps with this question.
- Question 8B Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough? If so do you consider: (i) the implementation of a blanket density threshold; or (ii) a range of density thresholds reflective of the character of the local areas to be preferable?
 - High density development often entails a higher percentage of impermeable area and therefore surface water run-off in times of storm. Even if the sites final discharge is limited the time of concentration decreases in relation to the increase of impermeable area. This can pose a potential flood risk.
 - Should a varying density threshold be deployed we would encourage that flood risk aswell as local character be considered.
 - Increased density and additional dwellings should not be at the expense of provision of green-open space or use of green infrastructure.

Delivering Quality Development

- Question 9A 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?
 - We believe this is a really positive approach and whilst we often represent on Green Open Space Plans we also offer our help with identifying where green infrastructure may be most effective. We have had several successful pilot study’s partnering with the Environment Agency and various Local Planning Authorities. These studies have identified ideal locations for green infrastructure and suggested how land at risk of flooding could be enabled for development by a multiagency intervention elsewhere.
 - We would welcome some blanket policies around surface water management which would help drive the uptake and increase the deployment of “good” SUDS such as tighter restrictions to site run-off. A simple way of doing this could be to ask that all development discharges to greenfield run-off rates or lower which would mean better SUDS management train designs would be required to deliver this.

- Quite often SUDS and drainage strategies are a final consideration for developments and aren't shared in detail until full planning is submitted where at this stage little flexibility for change or adaptations is feasible. Having a clear drainage and surface water strategy at outline planning both enables water companies to consult and work with developers as well as make meaningful representations through the planning process reducing the likelihood for Grampian style planning conditions to be requested.
- Question 9E Do you consider that the described approach will achieve the Council's ambition of maintaining and increasing tree cover within the Borough? Are there any further measures which you think should be adopted to further enhance these efforts?
 - Severn Trent's Great Big Nature Boost - We are embarking on one of the biggest nature projects across the UK, by boosting nature across 5,000 hectares of land in the Severn Trent region by 2027. We're looking for partners to work with us to create and improve habitats for wildlife. If you have any land that could be improved for biodiversity, or know of any biodiversity projects that need funding please contact [REDACTED] Projects must deliver a biodiversity net gain and not be part of an offsetting project.
 - Visit our website to find out more about our biodiversity ambition (<https://www.stwater.co.uk/about-us/environment/biodiversity/>).

Water Cycle Study

We recommend careful review of the recent/ongoing water cycle study outputs which we have collaborated to produce. The information from this study should be used to help guide site selection or implement the necessary site specific policies or conditions required to ensure future allocations and developments do not adversely impact existing infrastructure. We are not suggesting that infrastructure provision is a blocker to development and challenges to its delivery can be often be overcome however early engagement around problematic or constrained sites can help drive policies or masterplans which simplify delivery later on. We suggest all commentary within the water cycle study around constraints at wastewater treatment works, or surface water disposal are given the closest attention. We will build on our commentary for individual sites as you enter preferred option and draft plan stages.

For your information we have set out some general guidelines that may be useful to you.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewer system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing

specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Strategic Catchment Planner

[Redacted signature]

**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	Michael	
Surname	Price	
E-mail address	[REDACTED]	
Job title (if applicable)	Director	
Organisation (if applicable)	Stafford Riverway Link CIC	
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 M.Price		Organisation Stafford Riverway Link CIC			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Vision and Objectives	Paragraph	3.9	Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>With regard to the Key Objectives – Stafford, Stafford Riverway Link CIC fully supports Key Objective No.6. It considers that the Community Interest Company’s own objective of restoring navigation from the Staffordshire and Worcestershire Canal at Baswich to the Centre of Stafford will be an integral part in enhancing green infrastructure envisaged in the statement. The Riverway Link would provide part of a green link from open countryside into the centre of Stafford. It would also provide an additional walking route between the town centre, Baswich and beyond via the existing towpath.</p> <p>The Company wishes to see Key Objective No.6 carried forward into the New Local Plan and requests that it includes a policy supporting the restoration of the Link.</p> <p>It is further considered that enabling boats to reach Stafford would contribute to the economic life of the town centre and provide a focus of interest as part of its leisure and cultural attractions, envisaged in Key Objective No.8.</p>					

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

Figure		Question		Other	
2. Please set out your comments below					

Please use a continuation sheet if necessary

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

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

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

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

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

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

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

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

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

We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to

transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.

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



Stowe by Chartley Parish Council

Clerk to the Council:
Mrs. C. Gill,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Stowe by Chartley Parish Council Response to Stafford Borough Council Local Plan Review 2020-2040

New Garden Settlements

Stafford Borough is considering a number (7) of potential developments for a new garden settlement(s). The sites are at Gnosall, Haughton, Seighford, Redhill, Cold Meece, Hixon and Weston.

The Hixon site extends to 107 hectares with a potential for 2,750 houses, while the Weston sites add up to 125 hectares with a potential for 2,250 to 2,750 properties. Cold Meece is the largest and possibly the preferred site.

Hixon Airfield is considered second most viable.

The Hixon Airfield site is incorrectly classed as part of the existing Recognised Industrial Estate boundary. **This is untrue!** The site is outside the Recognised Industrial Estate Boundary as defined in the current Plan for Stafford and the adopted Hixon Neighbourhood Plan.

However, planning permission for a large scale development (Application 16/25450/OUT) of 2,000 houses on a 143 hectare site at Beaconside in Stafford has recently been approved. 69 hectares will be developed at a density of 30 properties per hectare. Only 12% of the properties will be classed as "affordable" as compared to the normal agreed 30%.

The application also includes provision of two "Local Centres", which will provide food and non-food Shops, a public house, health centre, 60-bedroom elderly Living Facility, Primary School (2 forms and costing £6,859,350), Secondary School (5 forms and costing £6,345,280), office space and green infrastructure. There will be 14 hectares of 'adoptable' open spaces. Stafford Borough Council Leisure Services will receive £1,831,147 to equip different play and recreational areas. There will be a large number of balancing ponds and 'swales'.

The site will be accessed by at least three new highway junctions.

STOWE BY CHARTLEY RESPONSE:

If one or more of the Hixon and Weston sites were to be developed it would change the character of the area irrevocably.

Unlike the Beaconside site, which is essentially an extension of the Stafford town urban boundary, Hixon Airfield is located in the rural area and is bordered by three villages, each with their own distinct local character. The site would dwarf the villages of Hixon, Stowe-by-Chartley and Weston.

Hixon and Stowe-by-Chartley are not well served by public transport. Even with an improved level of public transport provision, it is highly unlikely that new residents would swap their car for public transport to access places of work in Stafford, Uttoxeter, Rugeley, Stone and beyond.

The Hixon Airfield site would generate huge numbers of vehicle movements along Stowe Lane and Bridge Lane in Stowe-by-Chartley that would feed onto other small rural roads.

Stowe by Chartley Parish Council objects to the Local Plan Review 2020-2040 for the inclusion of land on Hixon Airfield for housing development of in excess of 2,000 properties. The possible benefit of more local amenities would not offset the harm to the character and distinctiveness of the area. Stowe by Chartley Parish Council also objects to the inclusion of similar sites either side of the A518 (Uttoxeter Road) at Weston.

SHELAA sites in Hixon

Eight sites (excluding the Hixon Airfield site ID HIX07) totalling 22.3 hectares, are included in the latest SHELAA list for housing development in Hixon. The potential yield of properties is 422.

STOWE BY CHARTLEY PARISH COUNCIL RESPONSE

All the sites are outside the settlement boundary as defined in the Plan for Stafford and the adopted Hixon Neighbourhood Plan.

Stowe by Chartley Parish Council objects to the inclusion of the following sites for housing development;

SITE ID HIX01; SITE ID HIX03; SITE ID HIX04; SITE ID HIX05; SITE ID HIX06; SITE ID HIX09; and SITE ID HIX10 ; and SITE ID HIX12

Three further sites, totalling 22.4 hectares, are included in the latest SHELAA list for employment land in Hixon.

STOWE BY CHARTLEY PARISH COUNCIL RESPONSE

All the sites are outside the Recognised Industrial Estate boundaries as defined in the Plan for Stafford and the adopted Hixon Neighbourhood Plan.

For this reason, Stowe by Chartley Parish Council objects to the inclusion of the following sites for employment use;

SITE ID HIX02; SITE ID HIX08 and SITE ID HIX11

Section 3 Stafford Borough Council Vision and Objectives

“The Vision, as expressed in the current Local Plan is now considered to be too long. It is therefore the intention that the New Local Plan should be guided by a new vision that is shorter and focussed on the aspects that the plan will seek to deliver over the period 2020-2040.”

Stowe by Chartley Parish Council agrees “The Council is minded to develop a Vision for the Plan that is more succinct and which conveys a strong sense of its development priorities for the next plan period.”

Stowe by Chartley Parish Council agrees: New Local Plan should be shorter and more concise. More importantly, public consultation documents should be more user-friendly and easier to comprehend and respond to.

“Stafford Borough Council has committed to the Government’s stated Policy for Carbon Neutrality by 2050.”

Stowe by Chartley Parish Council supports a holistic strategy to enable the raft of inter-relating policies to address the significant climate change and its consequences.

Key Objectives - Areas outside of Stafford & Stone

“Provide for high quality new small scale housing development at appropriate villages that reflects their distinctive local character. Deliver sensitive additional facilities to provide an improved level of local services appropriate to settlements that reduces the need to travel and is in keeping with the local character, the historic environment and the rural setting. Protecting designated sites, including the Special Areas of Conservation. New open space, sport and recreational facilities to meet the needs of the community, including through increased multi-use provision such as community halls.”

Stowe by Chartley Parish Council supports the above objectives.

Section 4 Sustainability and Climate Change

“It is important to ensure that the new Local Plan for Stafford Borough guarantees that all development delivered within the Borough contributes to the creation of a greener, more sustainable and more resilient environment. This can be achieved through embedding sustainability in the design of developments. By guaranteeing high levels of energy efficiency and ensuring access to renewable energy sources in all new development, a reduction in greenhouse gas emissions will be achieved.”

Stowe by Chartley Parish Council agrees with the above objectives

Section 5 Development Strategy

5.9 Depending on which methodology or Growth Scenario is used, a range of annual housing requirements is suggested. Using the Government’s standard Local Housing Need methodology 2019-2029 a minimum Housing Requirement of 408 dwellings per annum (dpa) is indicated. It is normally Government’s expectation that this figure will form a minimum unless exceptional circumstances can be demonstrated. Other methodologies suggest housing requirements ranging between 435 and 683 dpa or, between 489 and 746 dpa. For comparison the current Plan for Stafford Borough 2011-2031 requires 500 dpa to be delivered.

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

5.16 “It is recognised that some of the Key Service Villages have received a disproportionate amount of housing than others. The northern built up areas of the Borough are not properly recognised in the currently adopted Plan for Stafford Borough. Therefore, despite these settlements being sustainable locations with access to a wide range of services, facilities and public transport connections, planning applications for the development and redevelopment of land in these locations are not supported in the adopted Plan. It is therefore important that these settlements are properly recognised in the revised Settlement Hierarchy.”

Stowe by Chartley Parish Council agrees

‘Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process.’

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

5.46 This Option would propose a growth distribution as follows: • Stafford 50-70% • Stone 10-20% • North Staffordshire Urban Areas 5% • Large Settlements 10-20% • Medium Settlements 5-10% • Small Settlements 5-10%

Stowe by Chartley Parish Council response.....Agree, but no one settlement area should have new housing numbers above 15% of current housing total.

Section 7 Delivering Town Centres that address Future Needs.

“Planning policies should support the role of town centres at the heart of local communities through a positive approach to growth, management and future changes.”

Stowe by Chartley Parish Council supports this objective

8.7 The use of brownfield land for development means that the pressure placed on greenfield land is reduced, preserving the countryside and landscape of an area. The currently adopted Plan for Stafford Borough places preference on the development of brownfield land over greenfield land. Should the council continue to encourage the development of brownfield land over greenfield land?

Stowe by Chartley Parish Council supports use of Brownfield sites rather than greenfield sites

8.1 “Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development? b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens? c) Is there a need for bungalows to be delivered in both urban and rural areas? d) Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?”

Stowe by Chartley Parish Council supports a policy requiring bungalows to be delivered on all development sites over ten units.

“Self and Custom Build Housing 8.33 The Self-Build and Custom Housebuilding Act of 2015 mandates that all Local Planning Authorities keep a register of parties interested in designing and building their own homes in their locality. Self-build homes have the potential to raise design standards and diversify the housing stock of an area. Developments to provide 5% of plots as serviced plots available for self and custom build homes”

Stowe by Chartley Parish Council supports a policy of encouraging more plots for the purpose of self-build throughout the borough

Green and Blue Infrastructure

“There are a number of sites in the Borough that are internationally designated. The “Natura 2000 network” consists of sites that are of exceptional importance for the protection of rare, endangered or vulnerable natural habitats and species within the European Community. These sites comprise of (sic) Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) within Stafford Borough the international designations are: Special Areas of Conservation: Cannock Chase, Pasturefields Saltmarsh, Motte Meadows; and Chartley Moss.”

Stowe by Chartley Parish Council supports the protection of these sites.

The Importance of Tree Stock

9.24 The currently adopted Plan for Stafford Borough does not provide a specific policy to maintain and enhance tree cover in the area. It is the ambition of the Council to take the necessary steps to

ensure that the realisation of this objective is enabled by the new Local Plan. The existing tree stock within the Borough will be offered adequate protection from removal or damage and that any development which provides an opportunity to increase tree cover on site.

Stowe by Chartley Parish Council supports this objective.

Leisure facilities

“Stafford Borough Council should seek to designate land within the New Local Plan 2020-2040 to address the Borough-wide shortage of new sporting facilities and identify within the New Local Plan 2020-2040 a site in which a new swimming pool should be developed.”

Stowe by Chartley Parish Council agrees with these objectives

Public Transport

“Much of the Borough’s population outside of Stafford and Stone are living and / or working in remote rural areas where the choices of transportation modes are currently limited and the use of the private car is generally a necessity. In these areas the Borough Council will seek to reduce the need for long distance commuting by providing adequate employment opportunities and retention of local facilities in rural areas.”

Stowe by Chartley Parish Council response; It is a falsehood to link housing with employment opportunities if those employment opportunities do not offer appropriate jobs.



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

25th March 2020

Dear Sirs,

Stafford Borough Council, Local Plan Issues and Options consultation

I am writing on behalf of Doxey Parish Council in relation to the above.

The Parish Council would like to respond to the below sections of the consultation and their comments are as follows:

Section 9 Delivering Quality Development

9A Doxey Parish Council support that there should be a separate policy that addresses Green and Blue infrastructure. They would also like to see specific opportunities for development opportunities to provide additional green infrastructure to help provide the missing links in the network. In addition, existing amenity spaces such as pitches should be protected and development and loss of them prevented including moving them to other sites in the town.

9E Tree cover – Doxey Parish Council would like to see policies ensuring that newly planted trees in large developments are managed from day 1 and not left for long periods of time before being handed to management companies. We would also like to see specific measures to ensure adequate management of planted trees is provided for on these developments to ensure their long term viability. For examples, many developments are looking at community orchards, these need to be well managed to fruit successfully.

9M – Doxey Parish Council strongly agrees that the designation of sites as Local Green Space is necessary in the new local plan. Green spaces especially in our community are not plentiful and LGS designation is a mechanism which gives our green spaces once designated greater protection against development.

9N

- (a) Doxey Parish Council believe that Doxey Parish is poorly served by public open space. The Parish has one pitch and 2 play areas, one of which is very small with very limited equipment. We believe this is much lower than many other areas in Stafford and would like the Local Plan to seek to address this imbalance.

(e) Doxey Parish Council support applying the Fields in Trust standard to providing sports and children's facilities. We believe that residents should have the best possible access to green space, sport and pitches and that with increased development of Stafford Town this becomes even more important in this local plan.

90 – Doxey Parish Council supports that the Borough Council should seek to designate land within the new local plan to address Borough-wide shortage of new sporting facilities. We also strongly support that existing pitches within communities need to be retained. The problem of shortage of facilities should not just be met with shiny new facilities potentially away from existing communities which increases travel in the town and also restricts access often for those who most need it.

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

Kind regards,



Lisa Horritt
Clerk to Doxey Parish Council

From: Eiryl McCook [REDACTED]
Sent: 08 April 2020 16:12
To: List-ForwardPlanning-SBC
Subject: Local Plan Review : Issues and Options Feedback

Hi Amanda/Elle/Alex

I hope your all well and keeping safe.

As you are probably aware, Homes England have now completed on the freehold transfer to Homes England of the MoD Site 4 Stafford. MoD remain in occupation under a leaseback while they arrange to decant their existing operations. As such, the duty would fall with us, rather than DIO to comment on the site with regard to the ongoing local plan review.

The current Plan for Stafford Borough Part 2 identifies the site as a protected area on the Stafford Town Inset Map (para 2.36). However, I note that the site is within the settlement boundary as per your Stafford Map (January 2017) and as such the principle of residential development may be supported.

We would express our support for this continued position in the review.

We have no additional comments on the plan at this time.

Kind regards

Eiryl McCook
Senior Planning and Enabling Manager MRTPI

Haughton Parish Council response to Stafford Borough Council's new 2020 - 2040 Local Plan

Part 1 Detailed Response

Haughton Parish Council has considered the Stafford Plan and offers some initial specific feedback concerning the questions posed for consultation. This is listed below against the numbering scheme used in the Plan.

Q1.A and Q1.B Should a study be commissioned on how the changes would effect existing industries(e.g.Farming)

Q3.A No. The previous plan still has 10 years to run I cannot see the point of change so soon. if you started this exercise in 2023 say then you would have a new plan in place by 2030.

Q3.B Yes

Q3.C Yes

Q3.D Yes Right approach

Q3.E Yes

Q3.F Should you also be conserving and enhancing the historical character of Stafford particularly as it is one of the UK's oldest Boroughs.

Q4A Yes a and b

Q4B There is a south facing hill near Hopton overlooking the new HS2 route this would be an ideal spot for solar panels as it could also hide HS2 to some degree.

Q4.C yes. Even better is a centralised heating system for groups of housing.

Q4.D NO. On shore wind is an eyesore there are better ways. Increased biofuel, solar even a small nuclear unit.

Q4.E No.

Q5.A a) Yes SP1 should remain

b) Yes we have a rural based economy and should protect as much of the rural parts of the borough as possible.

Q5.B a) Use method D although we should grow we have much larger urban areas to the North and South. growing at a higher rate is in danger of destroying the character of Stafford.

b) No. see above

Q5.C We do we need to grow at a substantially higher rate than we are at present. We should apply the discounted rate. We agreed a plan after much wrangling and I fail to see why this needs to change. Evidence of the rate of new housing going up is plain to see. Do we really want to increase that rate? I think not.

Q5.D a) yes

b) If you are to include smaller settlements should there be a plan to correct some of the lack of facilities e.g. lack of public transport. This could also be justified as a green issue by reducing carbon footprint.

Q5.E Yes

Q5.F Beware anything that could generate the merger of settlements. The wheel settlement system is good if you include and develop the facilities in key service villages

such as Eccleshall, Gnosall etc. as hubs. This system would allow Stafford to be a central hub with satellite key villages as sub centres and then smaller villages linking to them.

Q5.G No. Most of these garden villages appear to be an excuse for the County Council to sell off its rented farms for maximum profit. It is in danger of killing the development of the agricultural community which this part of Staffordshire is famous for. This is at a time when after Brexit the need for UK produced food is probably going to increase.

Q5.H Growth option 3 is the obvious but I see no mention of the proposed garden community to the North of Eccleshall. I this was included then I agree with option 5.

Q5.I Yes if that community is based on a brownfield site.

Q5.J See above

Q5.K Yes

Q5.L It would be useful to have a number of small business/factory units around gnosall to reduce the commute on the A518 to Stafford, Newport or Telford. If a satellite plan is adopted this would work.

Q5.M Yes

Q5.N Yes

Q5.O No

Q5.P No. Even small settlement should have some protection against sprawl. Particularly barn conversions

Q5.Q Yes

Q6.L Why not develop the centre of Stafford around the High House and the associated alleys off the Market Square into an 'old town' where small businesses could startup and flourish. We have many old buildings which could be reverted to their earlier state. I.e remove some of the modern frontages and go for a more traditional approach.

Q7 Improve the centre of Gnosall it has may characterful buildings that could be enhanced.

Q8.A Absolutely Do not destroy anymore Greenfield sites until you have used up the brownfield land.

Q8.B A range of density thresholds as it enhances the borough and allows flexibility.

Q8.C Yes

Q8.D Yes

Q8.E Only apply to new builds

Q8.F It depends what type of area you wish Stafford to be. If you wish to take the town upmarket then the 4 bed+ needs to increase.

Q8.G As above.

Q8.H Is there that proportion of wheel chair users?

Q8.I There is a definite need for bungalows both in the villages and towns.

Q8.J In the short term could some of the student accommodation be used to house the homeless or alternatively be converted into first time buyers affordable accommodation. The chance of New Beacon Group expanding at the rate required to fill all the units is debatable. BRING BACK A PROPER UNIVERSITY CAMPUS, alternatively persuade MoD to use the site for their training.

Q8.K a) Yes as SARH is now allowed to invest and reinvest in more homes.

b) Yes

Q8.L Yes with the provision that priority is given to residents of that rural area.

Q8.M No but you could add a provisor about the new 5 house rule.

Q8.N a) Yes

b) Yes. Self Build allows much more 'Character' to an area and should be encouraged as it could be an alternative way for people to get onto the property ladder.

Q8.O a) Yes

b) No. New blood may well be a way of keeping those communities alive.

Q9.A a) No Green and Blue infrastructure should be embedded in the main plan as it avoids conflict and perceived different priorities.

b) Yes. Green infrastructure is becoming key to improving mental health.

Q9.B Yes

Q9.C a)Yes

b) Yes

c) Isn't this already covered by Staffordshire Wildlife?

Q9.D Yes.

Q9.E The rules on protecting trees should be strengthened so that enterprising builders think twice before breaking the law.

Q9f.F Yes. a,b,c,and d Yes

Q9.G Large new developments can generate their own character.

Q9.H Areas around the town centre are historic, as are several of the villages e.g.

Eccleshall. Most of Staffordshire is typical rural farming landscape with rolling hills. This should be preserved.

Q9.I Yes to all.

Q9.J & K Some areas within the borough could easily allow very modern even leading edge designs. On the other hand there are areas where existing shops and buildings must meet the character of the area, indeed some should revert to more traditional styles. (e.g. Go to a high floor in the old high house and look at the roof lines and how old some of the buildings are. At ground level some of the facades are totally out of character to the buildings.

q9.L a, b, and c At least in all cases.

Q9.M Yes Green is essential.

Q9.N a to f Yes, g, why if there is already a standard available, h to j Yes and make it enforceable.

Q9.O a)Yes

b) You removed one in Gnosall and the county promised to replace it. Enforce that as a starter.

Q10.A a) No, Electric may not be the answer. Hybrid hydrogen Fuel cells are more practical

b)Yes if you can enforce it.

c) This should be unnecessary as vehicle emissions fall

d) No unless you have a crystal ball.

Q10.B Yes if possible.

Q10.C I thought Staffordshire used incineration instead of landfill.

Q11.A health and Well being are becoming increasingly important in the stressful world we live in. In line with the new RHS's(Royal horticultural Society) push for green areas being beneficial to health, this should be reflected in the new plan.

Q11.B See above

Q12.A Yes

Q12 B,C,D Possibility of minibus Park and ride at the edge of the town at say J13 and J14 of M6,

Q12.E Stafford has particularly bad mobile communications and broadband choices to the west of the M6. These need to be sorted

Part 2 Comments on the Process as a whole.

The Councillors also wish to offer a more general commentary on the Plan and consultation process which we trust you will take on board. We look forward to taking an active part in vital ongoing dialogue to ensure that our points and those of our community are properly addressed in future iterations of the Plan.

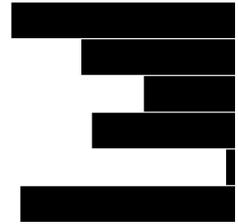
- The Plan fails as public facing document. It is far too long and loaded with vague, ‘ticked the box’, and stratospherically strategic statements that could apply to just about anywhere.
- The so-called vision lacks specific clarity that might be successfully embraced by the reader. Stated aims and objectives are similarly generic, lacking specificity and probably too numerous to provide much needed focus.
- The Plan and supporting documents bog down the reader. An executive summary of the supporting evidence would have been helpful to allow the reader to understand the background to some of the items.
- An apparent mash-up of proposals is presented which is sketchy at best and seems to indicate silo thinking rather than an essential joined up approach that might better address critical interdependencies. A deconstructed Venn diagram springs to mind that somehow needs to find its connectivity.
- Whilst it is helpful to consider planning challenges and themes such as housing, transport etc separately, we are unable to properly consider proposed solutions as currently presented. We feel that we can only properly consider planning proposals when they:
 - Are set in the context of a concisely described picture of the current position that is clearly evidenced and easy to see
 - Are set in the context of a concisely described picture of the optimum future position (vision) that accounts for evidenced drivers for change
 - Accurately describe fully integrated scenarios, setting out the inter-relationships and mutuality of impacts between the various building blocks involved. So for example housing developments must be described as a packaged proposal including interdependent transport, employment, infrastructure etc.
 - Are underpinned by a clear understanding of the criteria driving preference decisions about the various proposals and also the relative importance weightings of such criteria. So clarity about what is most important and least important in terms of the end game. This might be framed as up-sides and down-sides as follows -
 - Criterion based benefits realisation framework that can enable the reader to properly understand the relative benefits (up-side) of the various proposals.
 - A risk assessment and management framework that can enable the reader to properly understand how potentially negative consequences (down-sides) of various proposals will be mitigated. For example how the impact of increased traffic from having more domestic dwellings will be addressed

- A series of consultation events seem to be taking place over a very compressed period which is likely to impede public involvement in the process.



**ECCLESHALL
RUGBY UNION
FOOTBALL CLUB**

Tim West
Chairman
ERUFC



Dear Sirs

I write in response to the Stafford Borough Local Plan Consultation to register Eccleshall Rugby Football Club (RUFC) as an “interested party”.

The specific section of the Stafford Borough Local Plan that we have an interest is the proposals regarding a “Garden Community” within the Borough. This is since the area of land around Cold Meece, south of Swynnerton being considered for the Meecebrook garden development includes part of Baden Hall. (listed as Baden Hall Enterprises Ltd: 173 hectares)

Baden Hall has been the home of Eccleshall RUFC since 1992 and we would hope will be the home of Eccleshall RUFC for many years to come. Eccleshall RUFC was established in 1979 and has played at several locations in its 40-year history but non longer than the 28 years at Baden Hall.

We currently have 3 full size pitches, a floodlit training area and other grassed areas used for mini and junior rugby. We currently provide regular rugby for approximately 60-80 adults and 100-130 junior members.

An overview of our current requirements and challenges are included in the Boroughs “Indoor Sport Facilities and Playing Pitch Strategy” which states we have

“Three poor quality senior rugby union pitches. Two rated M0/D1 and one rated M0/D0. Eccleshall RUFC rents the site from a private owner. Site is accompanied by poor quality ancillary facilities. Pitches potential spare capacity discounted due to unsecure tenure and poor quality.”

The strategy recommends

“Improve pitch quality through enhanced levels of dedicated maintenance. Explore the feasibility of securing tenure for Eccleshall RUFC onsite. If tenure is secured explore improving the quality of ancillary facilities.

Alternatively assist the Club in securing long term tenure at a new site which is suitable for its current and future levels of demand”

While we would question the assessment of the quality of our pitches, the comments re our changing facilities and tenure are not questioned.

Should the Meecebrook proposals be progressed we would wish to enter into a proactive dialogue with the Borough Council and other stakeholders (Sport England, Rugby Football Union) to explore what options there might be for Eccleshall RUFC going forward.

We look forward to a positive dialogue with yourselves

Yours sincerely



Tim West
Chairman, Eccleshall RUFC

**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	Tim	
Surname	West	
E-mail address	████████████████████	
Job title (if applicable)	Chairman	
Organisation (if applicable)	Eccleshall Rugby Football Club	
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 Tim West		Organisation Eccleshall RUFC		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section		Paragraph	5.34	Table
Figure		Question		Other
2. Please set out your comments below				
<p>Having read the issues and options document and many of its supporting documents we would wish to register the interest of Eccleshall RUFC in the future planning for a garden settlement at Meecebrook,</p> <p>The proposed development site covers Eccleshall RUFC’s current home and therefore should the development proceed as planned would leave us “homeless”. Therefore, should this development be taken forward we would wish that appropriate consideration be given to the relocation of / compensation to Eccleshall RUFC.</p> <p>We attach a letter to accompany this representation that sets out the current position we are in and our request to be included at an appropriate time in the planning processes should the Meecebrook Garden Settlement proposals be progressed.</p>				

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

Please use a continuation sheet if necessary

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

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

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

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

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

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

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

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

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

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

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



Forward Planning
Stafford Borough Council
Clerk

Civic Centre

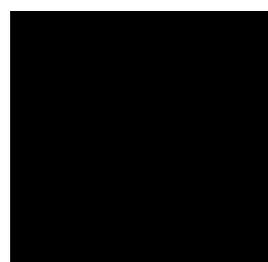
Riverside

Stafford

14th April 2020

Mrs S Stokes

High Offley Parish



Dear Sir/Madam,

High Offley Parish Council recognise that there is a need for housing growth within Stafford Borough during the period 2022 -2042 and depending on the options chosen this will require some growth within the existing Key Service Villages. High Offley Parish Council have carried out a consultation with our Parishioners and have found that there is significant support in Woodseaves for small infill locations of less than 10 dwellings per development. The Parish council have identified a number of sites that meet these criteria dispersed around Woodseaves, as contained within our submitted Neighbourhood Plan. We recommend that these locations are utilised for housing development within the village. Depending on housing densities these sites will support more than 10% growth in Woodseaves.

Yours faithfully,

Sue Stokes

Mrs S Stokes

Parish Clerk



	High Offley Parish Council Response.
Appendix 2 Full list of Questions	
Policy Theme and Questions	
Question number	
Section 1 – Introduction	
1.A.	
Is the evidence that is being gathered a suitable and complete list?	Yes
1.B.	
Have any key pieces of evidence necessary for Stafford Borough’s new Local Plan been omitted?	We would like to see more alignment between SBC and SCC especially regarding highways matters and consideration for other Leisure activities above indoor sport and playing pitches.
Section 3 Vision and Strategic Objectives	
3.A.	
Do you agree that the Vision should change?	Yes
3.B.	
Do you agree that the Vision should be shorter?	Yes
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?	Yes
3.D.	
Should the spatially-based approach to the Objectives be retained?	
Does this spatially-based approach lead to duplication?	
3.E.	
Is the overall number of Objectives about right?	Yes
3.F.	
Should there be additional Objectives to cover thematic issues?	
If so what should these themes be?	
Section 4 Sustainability and Climate Change	
4.A.	
Efforts to increase energy efficiency within the borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary.	
a) Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?	No, If necessary the Building Regs should be revised.

b) What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?	
4.B.	
Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?	all new homes should have at least one pitched roof facing south for PV generation and have a heat pump.
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
If so, where should they be located?	On industrial Estates and along side the M6 and the railways or local to existing turbines.
4.E.	
Should the council implement a higher water standard than is specified in the statutory Building Regulations?	No
Section 5 The Development Strategy	
5.A.	
a) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF?	Yes
b) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate's view.	Yes
5.B.	
a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements?	E
What is your reasoning for this answer?	
b) Should a Partial Catch Up rate allowance be incorporated?	No
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
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)?	5,500 to allow for 10% of homes remaining unbuilt.
5.D.	
i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?	Yes

ii. Do you agree that the smaller settlements should be included in the Settlement Hierarchy?	Yes it is a step in the right direction. ALL settlements should be allowed to grow by the same percentage as towns. Present policy has helped to kill small settlements over the last 70 years
5.E.	
The northern built up areas of the Borough are not properly recognised in the currently adopted Plan - most notably Blythe Bridge, Clayton and Meir Heath/Rough Close. Should these areas be identified in the Settlement Hierarchy for development?	yes, for all intents and purposes they are part of Stoke and Newcastle.
5.F.	
a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest?	Yes
b) Are there any of these spatial scenarios that you feel we should avoid? If so, why?	
c) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer	garden communities using brownfield sites plus dispersal across the whole borough
Policy Theme and Questions	
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?	Yes
If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate?	Meecebrook
Please explain your answer.	Meecebrook makes use of a large existing brownfield site with an opportunity for a rail connection.
5.H.	
i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)?	Yes
ii) If you do not agree what is your reason?	
iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.	
5.I.	

Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan?	Yes
Please explain your answer.	One Garden community built on a brownfield site would relieve pressure from multiple other sites that have already seen significant development and deliver a focused, purposeful development with dedicated infrastructure services.
5.J.	
What combination of the four factors:	
1. Growth Option Scenario (A, D, E, F, G);	D
2. Partial Catch Up	Yes
3. Discount / No Discount	Discount
4. No Garden Community / 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.	
5.K.	
Do you consider the EDHNA recommendations for an Employment Land requirement of between 68-181ha with a 30% (B1a/B1b) : 70% (B1c/B2/B8) split reasonable?	
If not, what would you suggest and on what basis?	
5.L.	
Do you agree that the assumptions made in the EDHNA about the need to replace future losses of employment land are reasonable?	
If not, please explain why.	
5.M.	
Should the New Plan broadly mirror the spatial distribution for new employment prescribed by the current Plan?	
If not, what would you suggest and on what basis?	
Policy Theme and Questions	
5.N.	
Do you consider the employment distribution proposed by Table 5.9 for a New Plan without and with a Garden Community / Major Urban Extension to be reasonable?	
If not please explain your reasoning.	
5.O.	
Are there any additional sites over and above those considered by the SHELAA that should be considered for development?	

If so please provide details via a "Call for Sites" form	
5.P.	
Do you agree that settlements of fewer than 50 dwellings should not have a settlement boundary?	
If not please provide reasons for your response including the specific settlement name.	
5.Q.	
Do you agree with the methodology used to define settlement boundaries?	
If not please provide reasons for your response.	
Section 6 Delivering Economic Prosperity	
6.A.	
a) What level of employment space provision for the Plan Period 2020-2040 do you consider to be optimal?	
b) Do you consider the distribution between business classes proposed by Table 6.1 appropriate? Please explain your answer.	
6.B.	
To ensure optimal economic prosperity, do you consider that the Council should:	
a) Allocate employment land so that it extends existing employment premises/areas in the Borough?	Yes
b) Allocate employment in both urban and rural areas?	Yes
6.C.	
Which specific locations (if any) do you think would benefit from the increased provision of employment premises?	
If so, for what type of activity?	
6.D.	
In allocating employment land should the Council consider a zoning approach* in order to encourage higher value-added activities?	
*Note - where site allocations in specific locations have specific Use Classes nominated to them	
6.E.	
Should the Council propose a policy preventing the redevelopment of employment premises to residential units?	No
If so, should the scope of such a policy be limited in any way?	
Please explain the rationale for your answer.	
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.	
6.G.	
a. Do you consider that a lack of suitable office space is a potential barrier to inward investment within the Borough?	
b. Where should the council seek to encourage the development of modern office space?	
Please explain the rationale for your answer.	
6.H.	
To assist the rural economy should the Council:	
a) Allocate land for employment purposes throughout the rural areas of the Borough?	
If so, which area(s) do you consider would be appropriate for this purpose?	
b) Extend existing rural business parks?	
If so, which ones?	
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?	Yes
6.J.	
To assist the rural economy should the Council consider a policy stipulating the installation of super-fast broadband throughout the rural areas of the Borough?	Yes
6.K.	
Are there any further potential Major Developed Sites in the Green Belt that should be considered for inclusion?	
If so please provide details.	
6.L.	
The Visitor Economy is considered by Policies E6 ("Tourism") and E7 ("Canal Facilities and New Marinas") in the currently Adopted Local Plan.	
a) Do these Policies continue to be sufficient in their current form or do they need adjustment?	
If so, how?	
b) Are there any Visitor Economy themes that should be more explicitly addressed?	
If so, which?	

Section 7 Delivering Town Centres that address Future Needs	
7.A.	
a) Do you consider that the hierarchy for Stafford Borough should consist of Stafford and Stone town centres with Eccleshall local centre?	Yes
If not please give a reason for your response	
b) Based on the evidence in the Stafford Borough Town Centre Capacity Assessment do you agree with the level of future retail convenience and comparison floorspace provision?	
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?	
b) Stafford and Stone have a proposed town centre boundary as well as a Primary Shopping Area boundary, with Eccleshall having a local centre boundary. Are these boundaries appropriate for future centre uses?	
If not please provide a reason for your response and an updated map (if appropriate).	
c) For Stafford a number of new development sites are suggested within the town centre area. Do you consider these sites are sufficient to meet future needs or are there other locations to consider? If so please specify.	
7.C.	
Do you consider with the local impact floorspace thresholds proposed for Stafford, Stone and Eccleshall to be appropriate?	
If not please provide reasons for your response.	
Section 8 Delivering 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?	
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?	Yes
Why do you think this?	Densities of existing locations should be maintained to preserve the character such as rural ares.
8.C.	

Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?	
8.D.	
Do you consider that the adoption of the Nationally Described Space Standards would work to increase housing standards, and therefore enhance the health and wellbeing of local residents in Stafford Borough?	
8.E.	
In the New Local Plan should the Council	
a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings?	
b) Only apply the Nationally Described Space Standards to new build dwellings?	
c) Not apply the Nationally Described Space Standards to any development?	
Please explain your answer.	
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?	
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?	
8.H.	
Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?	Yes
8.I.	
a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development?	Yes 10%
b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens?	
c) Is there a need for bungalows to be delivered in both urban and rural areas?	
d) Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?	
8.J.	

Do you consider that there is no need for additional provision of student accommodation within the Borough?	
8.K.	
a) Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable?	
b) In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient?	
8.L.	
Should the council require affordable units to be delivered on sites with a capacity of less than 5 units in designated rural areas?	No
8.M.	
In order to help maintain the potential supply of land for rural affordable housing should the Council, where development has not yet commenced, convert existing Rural Exception Site Planning Permissions to Rural Affordable Housing Site Allocations?	
8.N	
a) Should the council introduce a policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes?	Yes
b) Should the council allocate plots for the purpose of self-build throughout the borough?	Yes
8.O.	
a) Do you consider that the approach detailed above will be beneficial to the smaller settlements of the Borough of Stafford and their residents?	Yes
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?	Yes
Section 9 Delivering Quality Development	
9.A.	
Should the Council	
a. Have a separate policy that addresses Green and Blue Infrastructure?	
b. Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?	
9.B.	

How should Plan Policies be developed to seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider nature recovery network?	
9.C.	
Should the New Local Plan:	
a) Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate;	Yes
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	
Policy Theme and Questions	
9.D.	
How should Plan Policies have regard to the new AONB Management Plan and Design Guidance?	
9.E.	
Do you consider that the described approach will achieve the Council's ambition of maintaining and increasing tree cover within the Borough?	
Are there any further measures which you think should be adopted to further enhance these efforts?	
9.F.	
Question 9.F	
Should the Council consider a policy requiring that new developments take an active role in securing new food growing spaces? Yes / No.	
Please explain your answer.	
If yes, are the following measures appropriate?	
a) Protecting and enhancing allotments, community gardens and woodland;	yes
b) Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites;	yes
c) Requiring major residential developments to incorporate edible planting and growing spaces;	yes
d) Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities.	yes
9.G	
Should the new Local Plan set out specific policies to require new development to minimise and mitigate the visual impact that it has on the Character Areas and quality of its landscape setting?	yes

9.H	
Do you consider there are areas in the Borough that should have the designation of Special Landscape Area?	
If so, please explain where.	
9.I.	
Should the new local plan:	
1. Adopt a broad definition of historic environment encompassing a landscape scale and identification with natural heritage rather than the current protection of designated heritage assets approach?	
2. Take a broader and more inclusive approach by explicitly encouraging the recognition of currently undesignated heritage assets, settlement morphology, landscape and sight lines?	
3. Require planning applications relating to historic places to consider the historic context in respect of proposals for, for example, tall buildings and upward extensions, transport junctions and town centre regeneration.	
4. Encourage the maximisation of the wider benefit of historic assets by their incorporation into development schemes through imaginative design.	
5. Consider historic places and assets in the context of climate change permitting appropriate adaptation and mitigation measures.	
9.J.	
Do you consider that the current "Design" SPD provides sufficient guidance for design issues in the Borough?	
Please explain your rationale.	
9.K.	
Do you consider that the current "Shop Fronts and Advertisements" SPD provides sufficient guidance for shop front and advertisements issues in the Borough?	
Please explain your rationale.	
9.L.	
To support a new Local Design Review Panel should the new Local Plan:	
a. Require complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision?	
b. To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc.	

c. Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough.	
9.M.	
Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?	
9.N.	
a. Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so where?	
b. Are there any other Borough-wide facilities you feel should be associated with open space?	
c. Are there any settlements that you believe are lacking in any open space provision?	
d. Should the Council seek to apply Play England standards to new housing developments?	No
e. Should the Council seek to apply Fields in Trust standard to providing sports and children's facilities?	
f. Should the Council seek to apply Natural England's ANGSt to new development?	
g. Should the Council seek to develop a bespoke standard in relation to open and/or play space?	
h. Do you consider that developments of over 100 houses should incorporate features that encourage an active lifestyle for local residents and visitors (eg Play areas, open spaces, sports facilities)?	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?	
9.O.	
Should the Council:	
a. Seek to designate land within the New Local Plan 2020-2040 to address the Borough-wide shortage of new sporting facilities?	
b. Identify within the New Local Plan 2020-2040 the site in which a new swimming pool should be developed?	
Section 10 Environmental Quality	
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?	Yes
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?	
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?	
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.	Yes
Therefore, should the council;	
a) Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site?	Yes
b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?	
c) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford borough?	
Section 11 Health and Wellbeing	
11.A.	
a. Should the New Local Plan 2020-2040 continue to address health and well-being via relevant associated policies in the way the currently adopted plan does?	
b. Or should an alternative approach to the integration of health and well-being issues into the New Stafford Borough Local Plan be adopted?	
c. Where should references to Health and Wellbeing be strengthened in the New Stafford Borough Local Plan?	
11.B.	

If at Question 11.A b you considered that the Council should adopt an alternative approach to the integration of health and well-being issues into the New Local Plan which potential model would you advocate? (see Para 11.10: Models A; B; C)	
What is your reasoning for this answer?	
Section 12 Connections	
12.A.	
Do you agree with the general approach to delivering sustainable transport for Stafford Borough through the new Local Plan?	
If not please give a reason for your response	
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?	
12.C.	
a) Is there is an issue with overnight lorry parking at certain locations within Stafford Borough? If so, where?	
b) Is it appropriate to make provision for new overnight lorry parking at existing employment locations where new development will take place?	
If not please provide a reason for your response.	
12.D.	
a) Do you consider it is necessary to set local parking standards for residential and non-residential development ?	
b) If so should a similar approach of minimum standards be used for new developments across Stafford Borough or should maximum parking standards be identified for Stafford town centre area?	
Please provide a reason for your response.	
12.E.	
Do you consider that a new policy setting out the approach to new electronic communication infrastructure, its extent and location is required for Stafford Borough?	
Please provide a reason for your response.	
Section 14 Monitoring and Review	
14.A.	
a) Do you agree with the general approach to monitoring and reviewing New Local Plan policies and proposals?	

b) Are the currently employed indicators appropriate to monitor key planning policy issues?	
If not please give a reason for your response	

Clerk: Lisa Horritt

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

14th April 2020

Dear Sirs,

Local Plan Issues and Options Consultation

I am writing on behalf of Salt and Enson Parish Council who wish to respond to the following question on the consultation:

Section 5D:

ii. Do you agree that the smaller settlements should be included in the Settlement Hierarchy?

The Parish Council feel that Salt should not be considered as a smaller settlement unless development can address the following issues:

- ❖ Issues with infrastructure including narrow road layouts
- ❖ Lack of public transport leaving people without their own transport unable to access services and facilities outside of Salt.
- ❖ Lack of connection to mains gas
- ❖ Issues with sewers and drains which have been causing flooding and issues with gullies.
- ❖ The area is a floodplain and any development needs to reflect the issues with flooding above – this is actual flooding seen as opposed to flooding on flood assessments which may now not be in line with actual flooding.

They feel that as a small development any development would not be of a scale to resolve any of these issues. As they are close to 2 of the proposed garden village locations, if these went ahead then they are unsure how small scale development in Salt would be of benefit to the local plan overall.

If you need to discuss the matter or require any further information, please feel free to contact me.

Yours sincerely,



Lisa Horritt
Clerk to Salt and Enson Parish Council



New Stafford Borough Local Plan 2020-2040: Issues & Options Consultation

Contact Details

Planning and Local Authority Liaison Department
The Coal Authority

[Redacted]
[Redacted]
[Redacted]
[Redacted]

Planning Email:
Planning Enquiries:

[Redacted]

Date

15 April 2020

New Stafford Borough Local Plan 2020-2040: Issues & Options Consultation

Thank you for your notification of the 31 January 2020 in respect of the above consultation.

I have reviewed the document and can confirm that the Coal Authority has no specific comments to make in respect of the questions posed as part of this consultation.

Please do not hesitate to contact me should you wish to discuss this further.

Regards

[Redacted]

Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Development Team Leader (Planning)

Appendix 2 Full list of Questions – Response by Eccleshall Parish Council

Policy Theme and Questions		
Question number	Section 1 – Introduction	
1.A.	Is the evidence that is being gathered a suitable and complete list?	NO – Strategic Traffic assessment and other infrastructure evidence should be used.
1.B.	Have any key pieces of evidence necessary for Stafford Borough's new Local Plan been omitted?	Yes – See above. Has there been consideration of evidence such as the effect on infrastructure such as Doctors and schools due to overdevelopment in Eccleshall.
	Section 3 Vision and Strategic Objectives	
3.A.	Do you agree that the Vision should change?	Yes – need to look at other settlements rather than Stafford and Stone alone
3.B.	Do you agree that the Vision should be shorter?	YES
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?	YES. We would be failing in our responsibilities if development continues on areas prone to flooding, exacerbate global warming by cutting down trees and losing green space.
3.D.	Should the spatially-based approach to the Objectives be retained? Does this spatially-based approach lead to duplication?	We believe the point is being missed – Any development should be refused until additional facilities – parking- education- medical are available
3.E.	Is the overall number of Objectives about right?	SEE 3 D above

3.F.	Should there be additional Objectives to cover thematic issues? If so what should these themes be?	SEE 3 D above
	Section 4 Sustainability and Climate Change	
4.A.	<p>Efforts to increase energy efficiency within the borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary.</p> <p>a) Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?</p> <p>b) What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?</p>	<p>Yes – all new build should have solar panels and storage.</p> <p>New housing to incorporate inclusion of electric car charging points, or in earlier stages, make it as integrated as possible in terms of design.</p>
4.B.	Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?	SEE 4 A

Policy Theme and Questions		
4.C.	Should the council introduce a policy requiring large developments to source a certain percentage of their energy supply from on-site renewables?	SEE 4 A
4.D.	Should the council allocate sites for wind energy developments in the Local Plan? If so, where should they be located?	NO – not as efficient as solar with battery storage
4.E.	Should the council implement a higher water standard than is specified in the statutory Building Regulations?	Yes – should consider rain catchment tanks and filters to use for toilets baths etc. New builds could incorporate water butts in garden gutter run offs.
Section 5 The Development Strategy		
5.A.	a) Do you consider that the existing Policy SP1 addresses the requirements of the NPPF? b) Do you consider that it is necessary to retain this policy in light of the recent change in Planning Inspectorate's view.	YES - but what is sustainable? Highways , parking, flooding, should all be taken into account in all applications together with the results of on-site inspections supported by photographs
5.B.	a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements? What is your reasoning for this answer? b) Should a Partial Catch Up rate allowance be incorporated?	E – Allowing for Stafford station and Garden Village is necessary. All facilities can supplied from the start in the right geographical area and release the pressure on the smaller settlements B - Yes to allow the projects to proceed quickly

5.C.	<p>In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031?</p> <p>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)?</p>	<p>Yes – say 5000 as some will never get built.</p>
5.D.	<p>i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy?</p> <p>ii. Do you agree that the smaller settlements should be included in the Settlement Hierarchy?</p>	<p>Yes – but some smaller settlements are omitted – the likes of Slindon should be included</p>
5.E.	<p>The northern built up areas of the Borough are not properly recognised in the currently adopted Plan - most notably Blythe Bridge, Clayton and Meir Heath/Rough Close. Should these areas be identified in the Settlement Hierarchy for development?</p>	<p>Yes – but not to extend into Green Belt</p>
5.F.	<p>a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not what alternatives would you suggest?</p> <p>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>Intensification of Town and district centres will still need support from elsewhere</p> <p>Garden Communities will take pressure off larger settlements but will provide all its own infrastructure and facilities, but on the brownfield sites.</p> <p>Dispersal of development – some small additional development should be permitted to take the pressure off larger settlements that have already been over developed.</p> <p>String and wheel - unsatisfactory</p>

Policy Theme and Questions		
5.G.	<p>Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough's future housing and employment land requirements?</p> <p>If you do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate?</p> <p>Please explain your answer.</p>	<p>Mill Meece – is large and central to the whole Borough which will take pressure off other areas and will improve transport and access to major roads with a new Motorway junction.</p> <p>Maybe also Hixon if necessary, as it is a re-purposing of existing built land, ie. NOT green sites.</p>
5.H.	<p>i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)?</p> <p>ii) If you do not agree what is your reason?</p> <p>iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.</p>	<p>Yes, but the main concentration should be on Mill Meece as the major area.</p> <p>Hixon – as a secondary option, as it may be quicker to implement whilst Mill Meece catches up.</p>
5.I.	<p>Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan?</p> <p>Please explain your answer.</p>	<p>YES – as already explained</p>

5.J.	<p>What combination of the four factors:</p> <ol style="list-style-type: none"> 1. Growth Option Scenario (A, D, E, F, G); 2. Partial Catch Up 3. Discount / No Discount 4. No Garden Community / Garden Community <p>Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process? Please explain your answer.</p>	1
5.K.	<p>Do you consider the EDHNA recommendations for an Employment Land requirement of between 68-181ha with a 30% (B1a/B1b) : 70% (B1c/B2/B8) split reasonable? If not, what would you suggest and on what basis?</p>	Seems Reasonable
5.L.	<p>Do you agree that the assumptions made in the EDHNA about the need to replace future losses of employment land are reasonable? If not, please explain why.</p>	Seems Reasonable
5.M.	<p>Should the New Plan broadly mirror the spatial distribution for new employment prescribed by the current Plan? If not, what would you suggest and on what basis?</p>	Yes – but due to the climate change and recent flooding any further development at Raleigh Hall should be re-considered – allocated area is flooded regularly and on old plans is shown as “ Ankerton Pond”.

Policy Theme and Questions		
5.N.	Do you consider the employment distribution proposed by Table 5.9 for a New Plan without and with a Garden Community / Major Urban Extension to be reasonable? If not please explain your reasoning.	Yes – but take into account earlier comments.
5.O.	Are there any additional sites over and above those considered by the SHELAA that should be considered for development? If so please provide details via a “Call for Sites” form	NO – Large settlements have already used up the land within their adopted residential boundaries – No more additional development should be considered until infrastructure and facilities are improved.
5.P.	Do you agree that settlements of fewer than 50 dwellings should not have a settlement boundary? If not please provide reasons for your response including the specific settlement name.	Yes - some small settlements will benefit by planning gain in the form of additional public facilities . Slindon would benefit from some “infill” together with off road parking for members of the community adjacent to the only public building.
5.Q.	Do you agree with the methodology used to define settlement boundaries? If not please provide reasons for your response.	No – there should some flexibility in small settlements for some infill.
Section 6 Delivering Economic Prosperity		
6.A.	a) What level of employment space provision for the Plan Period 2020-2040 do you consider to be optimal? b) Do you consider the distribution between business classes proposed by Table 6.1 appropriate? Please explain your answer.	Due to unsuitable road widths leading to Ladfordfields and Raleigh Hall any expansion which creates additional HGV traffic should be curtailed until there are major road improvements between the sites and J14 of M6 then restrict any future use to office only.

6.B.	<p>To ensure optimal economic prosperity, do you consider that the Council should:</p> <p>a) Allocate employment land so that it extends existing employment premises/areas in the Borough?</p> <p>b) Allocate employment in both urban and rural areas?</p>	See 6A
6.C.	<p>Which specific locations (if any) do you think would benefit from the increased provision of employment premises?</p> <p>If so, for what type of activity?</p>	See 6A
6.D.	<p>In allocating employment land should the Council consider a zoning approach* in order to encourage higher value-added activities?</p> <p>*Note - where site allocations in specific locations have specific Use Classes nominated to them</p>	See 6A
6.E.	<p>Should the Council propose a policy preventing the redevelopment of employment premises to residential units?</p> <p>If so, should the scope of such a policy be limited in any way? Please explain the rationale for your answer.</p>	<p>Yes – if no restriction then this is a back-door way to residential development. However, the town centre has sadly neglected public buildings (town hall, public library, old unemployment building further out) and if they can be converted and used as residential, this would be an improvement.</p>

Policy Theme and Questions		
6.F.	<p>a) Where do you consider small and medium size units should be made available?</p> <p>b) Do you consider there are any other issues relating to building type and size which may be potentially restricting economic opportunity within the Borough? Please explain the rationale for your answer.</p>	Only where there are satisfactory access and facilities.
6.G.	<p>a. Do you consider that a lack of suitable office space is a potential barrier to inward investment within the Borough?</p> <p>b. Where should the council seek to encourage the development of modern office space? Please explain the rationale for your answer.</p>	<p>By the railway Station – to allow commuting by train.</p> <p>The old unemployment building near The Range could be refurbished into modern office suites. Recognised industrial estates are ideal locations for start ups and small business offices due to their proximity to potential customers and warehouse space.</p>
6.H.	<p>To assist the rural economy should the Council:</p> <p>a) Allocate land for employment purposes throughout the rural areas of the Borough? If so, which area(s) do you consider would be appropriate for this purpose?</p> <p>b) Extend existing rural business parks? If so, which ones?</p>	<p>Only where there are supporting facilities and parking.</p> <p>Not where it risks building on greenfield sites. Consider the conversion of unused farm building and existing industrial estates.</p>

6.I.	<p>To assist the rural economy should the Council:</p> <p>a) Seek to allow for the expansion of rural business premises where this might be otherwise restricted by the relevant planning policies? Should there be any restrictions or conditions to such expansion?</p> <p>b) Propose a policy stipulating the installation of super-fast broadband to all new business development in the rural areas of the Borough?</p>	YES – but not on greenfield sites.
6.J.	<p>To assist the rural economy should the Council consider a policy stipulating the installation of super-fast broadband throughout the rural areas of the Borough?</p>	YES
6.K.	<p>Are there any further potential Major Developed Sites in the Green Belt that should be considered for inclusion? If so please provide details.</p>	None Known – but these could be within a comprehensive New Garden Village
6.L.	<p>The Visitor Economy is considered by Policies E6 (“Tourism”) and E7 (“Canal Facilities and New Marinas”) in the currently Adopted Local Plan.</p> <p>a) Do these Policies continue to be sufficient in their current form or do they need adjustment? If so, how?</p> <p>b) Are there any Visitor Economy themes that should be more explicitly addressed? If so, which?</p>	YES

Policy Theme and Questions		
	Section 7 Delivering Town Centres that address Future Needs	
7.A.	<p>a) Do you consider that the hierarchy for Stafford Borough should consist of Stafford and Stone town centres with Eccleshall local centre? If not please give a reason for your response</p> <p>b) Based on the evidence in the Stafford Borough Town Centre Capacity Assessment do you agree with the level of future retail convenience and comparison floorspace provision?</p>	A) – Yes, but Eccleshall needs extra parking to increase footfall as a local centre.
7.B.	<p>a) Do you consider that the future approach to the centre of Stafford, Stone and Eccleshall should be based on their respective distinctive characteristics?</p> <p>b) Stafford and Stone have a proposed town centre boundary as well as a Primary Shopping Area boundary, with Eccleshall having a local centre boundary. Are these boundaries appropriate for future centre uses?</p> <p>If not please provide a reason for your response and an updated map (if appropriate).</p> <p>c) For Stafford a number of new development sites are suggested within the town centre area. Do you consider these sites are sufficient to meet future needs or are there other locations to consider? If so please specify.</p>	<p>A) Yes, they are all very different.</p> <p>B) No – the boundary should include the largest public building – i.e. Holy Trinity Church</p> <p>C) What about the empty retail sites, town hall, and the old job centre building.</p>
7.C.	Do you consider with the local impact floorspace thresholds proposed for Stafford, Stone and Eccleshall to be appropriate? If not please provide reasons for your response.	NO – in the case of Eccleshall – where can you fit it in?

	Section 8 Delivering Housing	
8.A.	Should the council continue to encourage the development of brownfield land over greenfield land?	Yes – of course!
8.B.	Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough? If so, do you consider: the implementation of a blanket density threshold; or a range of density thresholds reflective of the character of the local areas to be preferable? Why do you think this?	It should suit the character of the area. NPPF suggests the densities are linked to the sustainability of transport and this policy should be flexible enough to determine densities to suit each area.
8.C.	Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?	Yes. NPPF suggests the densities are linked to the sustainability of transport and this policy should be flexible enough to determine densities to suit each area.

Policy Theme and Questions		
8.D.	Do you consider that the adoption of the Nationally Described Space Standards would work to increase housing standards, and therefore enhance the health and wellbeing of local residents in Stafford Borough?	YES
8.E.	In the New Local Plan should the Council a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings? b) Only apply the Nationally Described Space Standards to new build dwellings? c) Not apply the Nationally Described Space Standards to any development? Please explain your answer.	No – there should be no discrimination
8.F.	Do you consider that the housing mix detailed in the table above will be sufficient in meeting the needs of all members of the community?	Yes – but more larger units in rural areas. Also, more of these can be made available by including smaller properties such as bungalows as part of developments, for retired local residents.
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?	Yes – but more larger units in rural areas
8.H.	Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?	Yes – to supply the ageing population

8.I.	<p>a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development?</p> <p>b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens?</p> <p>c) Is there a need for bungalows to be delivered in both urban and rural areas?</p> <p>d) Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?</p>	<p>YES</p> <p>NO</p> <p>YES</p> <p>No</p>
8.J.	Do you consider that there is no need for additional provision of student accommodation within the Borough?	No need
8.K.	<p>a) Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable?</p> <p>b) In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient?</p>	<p>Yes – but unnecessary in some areas. Transport infrastructure should be available to support the units.</p> <p>Depending on if this still provides housing for young couples wishing to live in their local area.</p>

Policy Theme and Questions		
8.L.	Should the council require affordable units to be delivered on sites with a capacity of less than 5 units in designated rural areas?	NO
8.M.	In order to help maintain the potential supply of land for rural affordable housing should the Council, where development has not yet commenced, convert existing Rural Exception Site Planning Permissions to Rural Affordable Housing Site Allocations?	No
8.N	<p>a) Should the council introduce a policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes?</p> <p>b) Should the council allocate plots for the purpose of self-build throughout the borough?</p>	<p>NO</p> <p>Yes – as probably more attractive in rural areas</p>
8.O.	<p>a) Do you consider that the approach detailed above will be beneficial to the smaller settlements of the Borough of Stafford and their residents?</p> <p>b) Do you think it would be beneficial to only allow people the ability to build their own homes in smaller settlements if they have a demonstrable connection to the locality of the proposed development site?</p>	<p>Yes</p> <p>Yes</p>
Section 9 Delivering Quality Development		

9.A.	<p>Should the Council</p> <p>a. Have a separate policy that addresses Green and Blue Infrastructure?</p> <p>b. Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?</p>	YES
9.B.	<p>How should Plan Policies be developed to seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider nature recovery network?</p>	By way of S106 contribution, spent in the local parish rather than in other areas of the Borough.
9.C.	<p>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>	YES

Building work take place s to

Policy Theme and Questions		
9.D.	How should Plan Policies have regard to the new AONB Management Plan and Design Guidance?	Should Support
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?	YES – all trees in a potential development should be protected and no building works to take place within the safeguarded root zone. This should be strictly enforced. Some developments have cut down mature trees and planting saplings, but without proper maintenance, these have died. Trees and hedgerows should be protected.
9.F.	Question 9.F Should the Council consider a policy requiring that new developments take an active role in securing new food growing spaces? Yes / No. 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.	YES A – yes if specify woodland is including individual trees and hedgerows C- increasing allotments will benefit whole community. D – landscape for growing opportunities – i.e. farming! Farmland should be protected from developers to achieve this.
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 – no development should be allowed that has a negative impact on any area, not just character areas and landscape setting.
9.H	Do you consider there are areas in the Borough that should have the designation of Special Landscape Area? If so, please explain where.	Yes – some of the low lying ground next to flood plains – in order to protect against future flooding due to climate change. An example of this is the flood plain of the River Sow in

		Eccleshall, which should be protected from development.
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Policy Theme and Questions		
9.I.	<p>Should the new local plan:</p> <ol style="list-style-type: none"> 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. 	<ol style="list-style-type: none"> 1. The new plan should make sure all development is sympathetic to the Historic environment. 2. But rather than encouraging, explicitly stating to ensure developers do not find a way around this. 3. Yes, definitely. 4. It is hard to see how historic assets have been sympathetically incorporated into modern development schemes in many areas, as they can be lost with large scale buildings. The line of Stafford's town wall was marked by rows of cottages, which are now lost with the development of new retail areas.
9.J.	<p>Do you consider that the current "Design" SPD provides sufficient guidance for design issues in the Borough? Please explain your rationale.</p>	<p>Yes – except in conservation areas where unsightly and inappropriate rear extensions have been allowed. Eg. High Street, Eccleshall.</p>
9.K.	<p>Do you consider that the current "Shop Fronts and Advertisements" SPD provides sufficient guidance for shop front and advertisements issues in the Borough? Please explain your rationale.</p>	<p>No – should be very specific in relation to Conservation Areas. Guidance should include character of specific locations such as Eccleshall.</p>

<p>9.L.</p>	<p>To support a new Local Design Review Panel should the new Local Plan:</p> <p>a. Require complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision?</p> <p>b. To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc.</p> <p>c. Reconsider and update local design policies to more robustly reflect current national best practice, be based upon local Characterisation studies, and be specifically aligned with related and companion policy areas to support the wider spatial vision for the Borough.</p>	<p>a. Not Necessarily- could be very restrictive overall- each site should be looked at in view of local design and should be able to be assessed by people from the local community.</p> <p>b. Yes</p>
<p>9.M.</p>	<p>Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?</p>	<p>It is important to consider the designation of sites at Local Green Space. There should be a presumption against development unless in a settlement boundary</p>

Policy Theme and Questions		
9.N.	<p>a. Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so where?</p> <p>b. Are there any other Borough-wide facilities you feel should be associated with open space?</p> <p>c. Are there any settlements that you believe are lacking in any open space provision?</p> <p>d. Should the Council seek to apply Play England standards to new housing developments?</p> <p>e. Should the Council seek to apply Fields in Trust standard to providing sports and children's facilities?</p> <p>f. Should the Council seek to apply Natural England's ANGSt to new development?</p> <p>g. Should the Council seek to develop a bespoke standard in relation to open and/or play space?</p> <p>h. Do you consider that developments of over 100 houses should incorporate features that encourage an active lifestyle for local residents and visitors (eg Play areas, open spaces, sports facilities)?</p> <p>i. Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure?</p> <p>j. Should the Council require all high density schemes to provide communal garden space?</p>	<p>Answers to a-g: if the Borough try to fulfil all the quoted standards then there would appear to be considerable duplication.</p> <p>Eccleshall still falls short of public open space appropriate for a larger community – parks nearer built up areas, a skate park,</p> <p>YES</p> <p>YES</p> <p>YES</p>
9.O.	<p>Should the Council:</p> <p>a. Seek to designate land within the New Local Plan 2020-2040 to address the Borough-wide shortage of new sporting facilities?</p> <p>b. Identify within the New Local Plan 2020-2040 the site in which a new swimming pool should be developed?</p>	<p>YES – but avoid greenfield sites</p> <p>YES – Eccleshall does not have this facility.</p>

	Section 10 Environmental Quality	
10.A.	<p>The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the council;</p> <ul style="list-style-type: none"> 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? 	YES to all.

Policy Theme and Questions		
10.B.	The currently adopted Plan for Stafford Borough does not enforce any policy to mitigate for the impacts of NO2 particles on internationally designated sites. Therefore should the council enforce a scheme whereby any development likely to result in an increase of NO2 deposition on these sites in Stafford Borough must contribute to a mitigation programme?	Why should this not be considered? Enforcement would need to be in place to ensure it happens.
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?	YES YES YES
	Section 11 Health and Wellbeing	

11.A.	<p>a. Should the New Local Plan 2020-2040 continue to address health and well-being via relevant associated policies in the way the currently adopted plan does?</p> <p>b. Or should an alternative approach to the integration of health and well-being issues into the New Stafford Borough Local Plan be adopted?</p> <p>c. Where should references to Health and Wellbeing be strengthened in the New Stafford Borough Local Plan?</p>	All development over 50 houses should do a full Health and Wellbeing assessment to the effect that this should show the impact on existing settlements.
11.B.	<p>If at Question 11.A b you considered that the Council should adopt an alternative approach to the integration of health and well-being issues into the New Local Plan which potential model would you advocate? (see Para 11.10: Models A; B; C)</p> <p>What is your reasoning for this answer?</p>	See 11A
	Section 12 Connections	
12.A.	<p>Do you agree with the general approach to delivering sustainable transport for Stafford Borough through the new Local Plan?</p> <p>If not please give a reason for your response</p>	Yes – but look at the effect from commercial development – Roads are sub-standard. It is noted to date that the increase in development in Eccleshall has not been met by any improvement in infrastructure. Roads are narrow and not maintained adequately. HGVs jam the High Street. Public transport provision has been reduced and forces residents to use cars.

Policy Theme and Questions		
12.B.	<p>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.</p> <p>b) How do you consider that high quality walking and cycling networks can be developed through new development?</p>	<p>NO – existing roads are already overused from Key Settlements to other areas.</p> <p>If they were installed it would need to be Borough wide, not just new developments. This is probably only practical in Stafford and Stone</p>
12.C.	<p>a) Is there is an issue with overnight lorry parking at certain locations within Stafford Borough? If so, where?</p> <p>b) Is it appropriate to make provision for new overnight lorry parking at existing employment locations where new development will take place? If not please provide a reason for your response.</p>	<p>A – yes. E.g. Crab Lane, Stafford. Borough industrial estates could have parking.</p> <p>New roads or widened roads are needed first.</p>
12.D.	<p>a) Do you consider it is necessary to set local parking standards for residential and non-residential development ?</p> <p>b) If so should a similar approach of minimum standards be used for new developments across Stafford Borough or should maximum parking standards be identified for Stafford town centre area? Please provide a reason for your response.</p>	<p>YES</p> <p>Yes – do come and try to park in the key Settlements (such as Eccleshall). Lack of parking forces parking in inappropriate areas.</p>

12.E.	Do you consider that a new policy setting out the approach to new electronic communication infrastructure, its extent and location is required for Stafford Borough? Please provide a reason for your response.	Yes – in view of Government proposal this will be necessary by 2035. A fast broadband connection is needed Borough wide.
13	Viability	No question was asked in this section but we believe that should move over to CIL on all development – even single plots. This should be set in “tablets of Stone” and allocated to all areas – health. Education , roads etc in agreed proportions
	Section 14 Monitoring and Review	
14.A.	a) Do you agree with the general approach to monitoring and reviewing New Local Plan policies and proposals? b) Are the currently employed indicators appropriate to monitor key planning policy issues? If not please give a reason for your response	YES (incorporating Neighbourhood plans). YES

EAST STAFFORDSHIRE BOROUGH COUNCIL EMAIL RESPONSE – 20 APRIL 2020

From: Clayton De Beauville [REDACTED]
Sent: 20 April 2020 22:37
To: forwardplanningconsultations
Cc: Ashley Baldwin; Alex Yendole
Subject: RE: Issues & Options Consultation Deadline Extension

Hi Cameron,

[RE: New Stafford Borough Local Plan 2020-2040: Issues & Options stage consultation](#)

Thank you for your email. Please see the East Staffordshire response to the Stafford Borough Council Local Plan (Issues and Options) below:

“The Council would welcome the opportunity to work closely with Stafford Borough Council on cross boundary matters under the duty to cooperate.”

Feel free to contact me ([REDACTED]) if you have any questions.

Stay Safe

Clayton De Beauville
Interim Principal Planning Policy Officer BCom(Hons), CIPD, MA (MRTPI)
Planning Policy
East Staffordshire Borough Council

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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Mr	
First Name	John	
Surname	Blount	
E-mail address	[REDACTED]	
Job title (if applicable)		
Organisation (if applicable)	Hopton and Coton Parish Council	
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 J Blount		Organisation Hopton and Coton Parish Council			
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	3A	Other	
2. Please set out your comments below					
Do not agree that the vision should change. The new one does not mention safety, infrastructure or diversity.					

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	3B	Other	
2. Please set out your comments below					
Yes, Shortening should be achieved by dropping the spatial approach, not by removing key parts of the vision that the Plan should address.					

2. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	3	Paragraph		Table	
Figure		Question	3C	Other	
2. Please set out your comments below					
Yes, this is a good example of where removing parts of the previous vision have left it deficient.					

3. 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	3D	Other	
2. Please set out your comments below					
<p>Yes, The spatial approach is too course grained although it does help to clarify the key objectives.</p> <p>Sometimes there is not enough duplication. For instance item 4. in Stafford Town objectives is ‘Avoid development in flood risk areas’. This is lacking from the objectives in other areas.</p>					

4. 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	3E	Other	
2. Please set out your comments below					
<p>Transport, broadband and telephony are hardly mentioned, especially in the rural areas where they are most important.</p> <p>There is no question about the actual objectives which is a pity. It would be nice to know about the choice of the words ‘Deliver’ or ‘implement’ in objective 11.</p> <p><i>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.</i></p> <p><i>Recommend that ‘communication’ is a thematic issue that needs it’s own objectives as it is poorly covered in the objectives as proposed.</i></p>					

5. 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	4A (a)	Other	
2. Please set out your comments below					
<p>Suggest that the ‘alternative frameworks’ referred to in 4.14 be identified so that consultees can make informed comments. Key parts of these ‘alternative frameworks’ should be included in the policy so that when the ‘frameworks’ get amended or scrapped the force of the policy endures.</p>					

6. 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	4E	Other	
2. Please set out your comments below					
The Plan should encourage the reuse of grey water in new developments for flushing toilets and irrigation.					

7. 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 (a)	Other	
2. Please set out your comments below					
Yes					

8. 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 (b)	Other	
2. Please set out your comments below					
No					

9. 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	5B (a)	Other	
2. Please set out your comments below					
<p>408pa</p> <p>The standard methodology gives 408 houses pa. Two other projections give lower figures. The only ones giving higher figures are those based on job growth using Cambridge Econometrics estimates. This organisations forecasting model ‘...could not be considered as a sufficiently reliable method...’ (EDHNA para 2.85 quoting 2012 SBC Employment Land Review). The one based on 2014 figures (‘the most reasonable assessment of likely future growth’ EDHNA para 10.88) is only 349 homes pa. Given that EDHNA says (para 5.29) ‘Future job trends are modest’ the uplift based on jobs growth seems to be based upon the Borough Council’s ambitions. HS2 talks about providing houses but says that nearly 80% will be provided ‘by accelerating homes identified in Local Plans’. EDHNA notes (para 6.9) that Staffordshire Technology Park ‘has a high vacancy rate’. A Garden Community would potentially provide 10,000 homes in addition to that forecast by the standard method. It is acknowledged that a problem is that affordable housing is a % of all new housing. 30%(?) of 408 is 122 – far from the affordable housing need of from 252 to 389 estimated in EDHNA.</p> <p>The Council would prefer a figure based on projections that exclude enhanced job targets.</p>					

10. 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	5B (b)	Other	
2. Please set out your comments below					
No. EDHNA reports (para 9.128) that properties have become less affordable so why would a ‘partial catch-up’ be appropriate ‘to reflect the accelerated rates young people who are able to form households since the end of the recession’?					

11. 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	5C	Other	
2. Please set out your comments below					
No. Recalculating the annual requirement makes sense but why would you add it existing provision? As far as the discount is concerned suggest that the discount be the total number for 2020-2031 calculated by the Standard Method using today’s data.					
12. 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	5D (i)	Other	
2. Please set out your comments below					
Hierarchy needs to include Rest of the Borough’ to capture ‘windfall’ sites and what the Borough Council thinks is ‘Stafford’ needs to be defined.					

13. 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	5D (ii)	Other	
2. Please set out your comments below					
‘Yes’ but proportionate.					

14. 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	5E (a)	Other	
2. Please set out your comments below					
Yes					

15. 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	5E (b)	Other	
2. Please set out your comments below					
<p>Avoid intensification both within and around town centres, the wheel and the string because of traffic congestion.</p> <p>Growth centred on Stafford town would not comply with NPPF. Congestion in Stafford is also bad. Even in 2011 the Staffordshire Local Transport Plan was saying ‘The [SATURN Traffic model] assessment revealed that without provision of additional highway capacity, as part of a wider sustainable transport strategy, the forecast travel demand associated with the town’s predicted growth will lead to congestion, especially during weekday peak periods along routes to the west of Stafford and the town centre’. Wider strategic planning is lacking so comprehensive solutions are unlikely to emerge.</p>					

16. 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	5E (c)	Other	
2. Please set out your comments below					
Garden Community with Dispersal to fill the housing gap between 2031 and 2040 as these choices will not exacerbate the traffic problems within the town centre.					

17. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
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Section	5	Paragraph		Table	
Figure		Question	5F	Other	
2. Please set out your comments below					
Yes, The Gateway Project is a major urban extension and is more than enough development on the edge of the town'.					

18. 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					
The Council consider Hixon Airfield as a Garden Village option, perhaps in combination with Weston because Meecebrook will take to long to come on stream. It should be put back to the next plan period. Hixon will be more modest and has a measure of existing infrastructure. Highway connection to the A518 is difficult but very desirable.					

19. 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 (i)	Other	
2. Please set out your comments below					
Yes					

20. 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 (iii)	Other	
2. Please set out your comments below					
No					

21. 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	5I	Other	
2. Please set out your comments below					
Yes, Some Key Service Villages and areas on the periphery of Stafford have accommodated significant growth and need time to consolidate.					

22. 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	5J	Other	

2. Please set out your comments below

Growth scenario A, No PCU, Discount, Garden Community.

‘A’ would supply sufficient housing based on the Standard Model without taking account of projections of possible new development. The partial pick-up shows no sign of emerging. Applying the discount removes double counting and the Garden Community provides the opportunity for a well designed new community whilst removing congestion from existing centres.

23. 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	5K	Other	

2. Please set out your comments below

HS2 likely to support jobs in London. The Midlands Engine hardly mentions Stafford at all and over 48ha is lost to ‘other uses’ over the plan period.

If policy constrained the opportunities to use land allocated for employment for other purposes then the 48ha saved would mean that the base figure of 68ha would be adequate.

24. 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

No. Policy should remove the need to replace lost employment land.

25. 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	5M	Other	

2. Please set out your comments below

Yes

26. 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	5N	Other	

2. Please set out your comments below

The table shows ‘Stafford’, ‘Stone’, ‘Rest of Borough’, ‘Garden Community’. Need to know if this will lead to more development in Hopton.

Stafford needs to be defined in order to answer the question.

27. 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	5O	Other	

2. Please set out your comments below

No

28. 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	6A (a)	Other	

2. Please set out your comments below

Agree with Scenario 6 in EHDNA, giving a need for 67.98ha of Class-B employment land.

29. 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	6A (b)	Other	

2. Please set out your comments below

Yes, Corona virus will give new impetus to the trend to purchase goods on-line with subsequent local delivery.

30. 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	6B (b)	Other	
2. Please set out your comments below					
Rural Industrial sites and developments such as Grindley Business Village can support local communities.					

31. 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	6C	Other	
2. Please set out your comments below					
Pasturefields and M6 Junction 13. Ask South Staffs to cooperate by providing an allocation in their review. Near to proposed new rail hub near Gailey as well as motorway junction. Type of activity? Distribution.					

32. 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	6E	Other	
2. Please set out your comments below					
Yes, No. The scope of such a policy should not be limited in any way. The present scale of land with good employment potential lost to other activities undermines the careful planning that is done for the benefit of the whole Borough. The lack of standards for industrial units turned into dwellings needs to be addressed.					

33. 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	6F (a)	Other	
2. Please set out your comments below					
With work increasingly being done at home (especially in the present circumstances) policies on home office accommodation and starter units are needed. Health services (human and veterinary) are being provided by home based or small unit based firms in rural locations.					

34. 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	6G (b)	Other	
2. Please set out your comments below					

Rural Areas. Farms diversifying into providing small office accommodation would help agricultural units by providing a more stable income stream that is available from agriculture.

35. 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	6C	Other	

2. Please set out your comments below

Pasturefields and M6 Junction 13. Ask South Staffs to cooperate by providing an allocation in their review. Near to proposed new rail hub as well as motorway.
Distribution companies.

36. 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	6E	Other	

2. Please set out your comments below

Yes to policy, No to limiting. The present scale of land with good employment potential lost to other activities undermines the careful planning that is done for the benefit of the whole Borough. The lack of standards for industrial units turned into dwellings needs to be addressed.

37. 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	6F (a)	Other	

2. Please set out your comments below

With work increasingly being done at home (especially in the present circumstances) policies on home office accommodation and starter units are needed. Health services (human and veterinary) are being provided by home based or small unit based firms in rural locations.

38. 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	6G (b)	Other	
2. Please set out your comments below					
Rural areas. Farms diversifying into providing small office accommodation would help agricultural units by providing a more stable income stream that is available from agriculture.					

39. 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	6H (a)	Other	
2. Please set out your comments below					
Yes, all areas especially small rural hubs					

40. 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	6H (b)	Other	
2. Please set out your comments below					
Extend the boundaries of appropriate business parks, business villages, recognised industrial estates but ensure that these are defensible.					

41. 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	6I (a)	Other	
2. Please set out your comments below					
No. Without restrictions there is no purpose for the planning system.					

42. 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	6J	Other	
2. Please set out your comments below					

Yes

43. 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	6I	Other	
2. Please set out your comments below					
Need adjustment. Policy E6 is fine on the visitor attractions themselves but is light on the encouragement to provide visitor facilities. Use of the phrase ‘throughout Stafford Borough’ at the end of the opening paragraph is confusing. Does the policy support local initiatives?					

44. 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	8A	Other	
2. Please set out your comments below					
Yes					

45. 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	8H	Other	
2. Please set out your comments below					
Yes, As this is the only type of housing where this can be specified then the increasing number of elderly disabled people have no other option.					

46. 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	8I (a)	Other	
2. Please set out your comments below					
Bungalows should be seen as an option for a development on a skyline or open flat area or where there are a number of elderly residents needing single storey accommodation where they can live independent lives.					

47. 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	8I (b)	Other	
2. Please set out your comments below					
The curtilage should include a dedicated parking area to avoid obstructions and allow charging of electric cars.					

48. 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	8I (c)	Other	
2. Please set out your comments below					
Yes, but more so in rural areas where there is a higher proportion of elderly residents and support services are sparse.					
49. 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	8K (a)	Other	
2. Please set out your comments below					
No, to meet the viability criteria there would need to be an excessive supply of market houses.					

50. 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	8K (b)	Other	
2. Please set out your comments below					
Where a lower provision of affordable houses is <u>unavoidable</u> then fall back on the range suggested in EDHNA					

51. 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					
Yes					

52. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation					
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paper does this representation relate to?					
Section	8	Paragraph		Table	
Figure		Question	8M	Other	
2. Please set out your comments below					
Most definitely					

53. 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 (b)	Other	
2. Please set out your comments below					
Yes					

54. 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	8O a)	Other	
2. Please set out your comments below					
Yes					

55. 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	8O (b)	Other	
2. Please set out your comments below					
Yes, an excellent idea					

56. 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	9A (b)	Other	
2. Please set out your comments below					
Yes					

57. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
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Section	9	Paragraph		Table	
Figure		Question	9B	Other	
2. Please set out your comments below					
Onsite and offsite opportunities should be exploited employing the mechanisms given in Appendix J of 'Stafford Borough Nature Recovery Network Mapping.					

58. 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	9C (a)	Other	
2. Please set out your comments below					
Yes					

59. 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	9C (b)	Other	
2. Please set out your comments below					
Yes, see Appendix J of 'Stafford Borough Nature Recovery Network Mapping					

60. 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	9C (c)	Other	
2. Please set out your comments below					
Yes					

61. 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					
Needs to be both on and off site.					

Suggest following advice from The Woodland Trust:

Local authorities need to take the following steps:

- Ensure development land includes trees Every local authority should commit to a minimum 30% tree canopy cover target for new development land. For example, a developer levy could stipulate that a minimum of 10 trees are planted for every new house constructed.
- Commission and deliver an Emergency Tree Plan. All local authority areas must be surveyed to identify creation, restoration and protection opportunities for woods and trees, in particular on public landholdings³⁶, by the end of 2020. This could include tree canopy surveys of local authority landholdings (using a tool such as i Tree Canopy³⁷) to set new tree cover targets. Local authorities should use the results to inform their tree and woodland strategies by 2022, with emergency resources allocated to ensure delivery and integration across all policy areas.
- Protect trees outside woods. Local authorities must avoid the removal of any tree on their land in non-woodland areas, unless there are overriding arboricultural or health and safety needs for felling. If a tree must be removed, local authorities should implement minimum replacement planting ratios, which stipulate that for every non-woodland tree removed at least three new trees should be planted³⁸. These new trees should be located as close to the original location as possible and be the same type of planting (for example, street trees replaced by street trees). *Emergency Tree Plan* Woodland Trust.

62. 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	9F	Other	

2. Please set out your comments below

Yes. Policy needs to require developers to provide space for allotments, community gardens, woods or orchards or make a financial contribution or both. This will help to reduce the need to import food and also provide healthy outdoor exercise.

63. 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	9F (a)	Other	

2. Please set out your comments below

No, the provision of these facilities needs to be included.

64. 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	9F (b)	Other	

2. Please set out your comments below

Yes, very much so.

65. 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	9F (c)	Other	

2. Please set out your comments below

Yes

66. 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	9G	Other	

2. Please set out your comments below

‘Yes, add ‘enhance, restore and create’ (European Character Convention and Planning for Landscape Change SPD). Encourage low rise building and and tree planting.’

67. 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	9H	Other	

2. Please set out your comments below

‘Yes’, this would be a welcome return to a previous policy.

The area to the north, west and south of Beacon Hill (above Beaconside)

On a tongue of Triassic Limestone this hill can be seen for miles. On top, around a Triassic Sandstone outcrop, is Beacon Hill Wood. From this hill there are wide views across Stafford and Staffordshire. It is only a short walk from Beaconside but Beacon Hill Wood is a wonderfully wild and natural place away from the noise and bustle of the town below. Views to the north include Hopton Village, the site of the old and new churches below Church Hill and, further round, the site of the Battle of Hopton Heath. As a place for a beacon it is ideal. Just east of the wood five rights of way meet indicating the historic importance of this area.

68. 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	9I (1)	Other	

2. Please set out your comments below
Yes

69. 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	9I (2)	Other	
2. Please set out your comments below					
Yes					

70. 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	9J	Other	
2. Please set out your comments below					
No, Needs to apply to conversions from Class B use to residential. Needs to specify provision of charging points for electric cars and space to park to charge them not only on residential properties but on shops, pub and community hubs.					

71. 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	9L (a)	Other	
2. Please set out your comments below					
No, it's a Local Panel					

72. 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	9L (b)	Other	
2. Please set out your comments below					
No, incorporate key design features into policies.					

73. 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	9L (c)	Other	

2. Please set out your comments below

Yes

74. 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	9M	Other	

2. Please set out your comments below

Yes

75. 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	9O (a)	Other	

2. Please set out your comments below

Hopton and Coton Parish

76. 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	9O (c)	Other	

2. Please set out your comments below

Yes, Hopton and Coton Parish

77. 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	9O (d)	Other	

2. Please set out your comments below

Yes

78. 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	9O (e)	Other	

2. Please set out your comments below

Yes, but apply Natural England’s ANGSt guidance on provision if greater.

79. 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	9O (f)	Other	

2. Please set out your comments below

Yes, but apply Fields in Trust guidance on provision if greater

80. 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	9O (g)	Other	

2. Please set out your comments below

Yes, using Play England, Fields in Trust and Natural England guidance as this could be removed in the future.

81. 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	9O (h)	Other	

2. Please set out your comments below

Yes, Use Fields in Trust guidance

82. 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	9O (i)	Other	

2. Please set out your comments below

Yes

83. 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	9O (j)	Other	

2. Please set out your comments below

Yes, in rural areas this will enable Parish Councils to fulfil their statutory duty to provide allotments.

84. 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	9P (a)	Other	

2. Please set out your comments below

Yes, but not by using S106 agreements to support distant sites.

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

Section	10	Paragraph		Table	
Figure		Question	10 A (a)	Other	

2. Please set out your comments below

All development should take electric vehicle charging into account.

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

Section	10	Paragraph		Table	
Figure		Question	10 A (b)	Other	

2. Please set out your comments below
Yes

87. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	10	Paragraph		Table	
Figure		Question	10 A (c)	Other	
2. Please set out your comments below					
Yes, if an Air Quality Action Plan indicates that this is necessary					

88. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	10	Paragraph		Table	
Figure		Question	10 A (d)	Other	
2. Please set out your comments below					
Encourage tree planting					

89. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	10	Paragraph		Table	
Figure		Question	10 C	Other	
2. Please set out your comments below					
NO ₂ is primarily a risk to human health and is worst where traffic levels are high. Not clear why Internationally designated sites, such as Chartley Moss, should be singled out.					

90. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	10	Paragraph		Table	
Figure		Question	10 C (a)	Other	
2. Please set out your comments below					
Yes					

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

92. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	10	Paragraph		Table	
Figure		Question	10 C (c)	Other	
2. Please set out your comments below					
This requires a commitment not to neglect local recycling sites. Very important but difficult to achieve via the planning process					

93. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	11	Paragraph		Table	
Figure		Question	11 A (a)	Other	
2. Please set out your comments below					
No, in the current plan there is no specific reference to health centres, or even health issues, outside Stafford and Stone.					

94. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	11	Paragraph		Table	
Figure		Question	11 A (b)	Other	
2. Please set out your comments below					
Yes					

95. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	11	Paragraph		Table	
Figure		Question	11 A (c)	Other	
2. Please set out your comments below					
Environment - using spatial planning processes to create health-promoting places.					

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

Section	11	Paragraph		Table	
Figure		Question	11 B	Other	

2. Please set out your comments below

B. Health is not alone in being linked with everything else so a separate policy is as appropriate for this as for anything else. A separate policy would ensure a clear focus on the issue.

97. 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 A	Other	

2. Please set out your comments below

Yes

98. 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 B (a)	Other	

2. Please set out your comments below

Partly. Encouraging working from home and clusters of small starter business sites can reduce the need to travel. See para 12.6 of Issues and Options consultation.

99. 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 B (b)	Other	

2. Please set out your comments below

S106 contributions

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

Section	12	Paragraph		Table	
Figure		Question	12 D (a)	Other	

2. Please set out your comments below

Yes, otherwise cars will clog up streets and charging electric cars won't be possible.

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

Section	12	Paragraph		Table	
Figure		Question	12 D (b)	Other	

2. Please set out your comments below

Yes. Limiting parking to discourage car use doesn't work.

102. 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 E	Other	

2. Please set out your comments below

Yes. It's easy, and necessary, to integrate the need for 5G into existing policy but siting of masts would be more difficult.

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

By email:

forwardplanning@staffordbc.gov.uk

Your ref:

Our ref:

Email: [REDACTED]

Direct line: [REDACTED]

Date: 20/04/2020

Dear Sir,

**Stafford Borough Council, Issues and Options Consultation February 2020 – NFU
Response**

The West Midlands NFU welcomes the opportunity to comment on the Stafford Borough Council Issues and Options Consultation Document. The West Midlands NFU represents approximately 5400 Farmers and Growers across the West Midlands region and over 50,000 farmers and growers nationally. In Staffordshire we represent over 1000 farmers and landowners, who in addition to being custodians of the environment, play an important role supplying high quality local food and supporting rural economies.

The NFU would emphasise the importance of all local plan documents, and urge Local Authorities to consider the potential impact they could have on rural economies, climate change, food security, providing affordable homes and getting essential rural infrastructure in place. We also have real challenges for our elderly rural population to ensure they get the services they need, including broadband, appropriate housing and dealing with isolation. At a time when we have an Agriculture Bill and Environment Bill coming forward, as well as changing trading conditions it is essential that the planning system can support their farming and rural communities to move to a more sustainable future.

Staffordshire's economy is underpinned by farming, with many landscapes maintained by family businesses. The Agriculture Bill will require them to be producing more food on less land, with new buildings and operations. Only if this happens can they then increase ecological and biological diversity of other land and landscapes and allow this to adapt to climate change. Only by allowing farming to become more productive can there be the ability to allow the landscape

to produce more public goods for the benefit of the wider community and visitors. The local plan has therefore to recognise and ensure it can happen with the minimum regulatory burden and support.

Food security is becoming more important, and access to sustainable, local food impacts on every carbon footprint. Currently only circa 8% of the fruit we eat and 53% of the vegetables are produced in the UK. Climate change, particularly access to water supplies, is affecting key countries who import to the UK, whilst areas such as Staffordshire continue to have more plentiful water and high quality soils and are much needed to produce more food for us. The need to ensure local produce is available to all has never been higher.

You may be aware that the farming industry is committed to be carbon neutral by 2040, which will mean land use change, more renewables and more efficient buildings, including glasshouse and polytunnels. The Government targets for 2050 and legislation now coming into force will affect how we live our lives, heat our homes and drive vehicles. We would ask you to ensure that the local plan promotes carbon neutrality and climate change provision. A simple way to cut a carbon footprint is access to local, sustainable food; but the local authorities can also help, by encouraging sustainable and inclusive housing design at a cost rural workers can afford, and that residents have access to vehicle charging stations and renewable energy supplies.

We have the following specific comments on the plan:

Question 4B and 4C

Renewable Energy

We would like to see support for small scale renewable energy in rural areas in this policy. This could include a range of technologies; solar, anaerobic digestion, biomass and small scale wind. As our work on achieving net zero evolves more information on the part local farms can play will become available.

Question 5Q

Development Principle 2: Sites with Planning permission and Land Exclusions (page 85).

We would encourage you to look again at the policy outlined at 5.97 iii. Agricultural farmsteads and horticultural sites could provide a valuable brownfield resource that could provide rural housing and employment opportunities.

Employment in Rural Areas

We welcome the recognition of the important role food producing businesses play as employers in rural areas.

Question 6.H

This policy does not include any support for agricultural and food producing businesses and we are surprised by the narrow focus on employment sites. This is a missed opportunity as they underpin the rural economy and they are supported in the Key Objective on page 29. Support for businesses to invest in new infrastructure that would enable them to run environmentally sustainable businesses is vital as is support for business diversification.

Question 6.I and 6.J

We welcome the policy support for rural broadband. It is vital for all types of rural businesses. We would also encourage you to look again at support for mobile technology. Mobile phone coverage has reduced in quality in some areas. It remains important for farming businesses and for the health and safety of all people living and working in rural areas.

Question 9A

Green and Blue Infrastructure (page 117)

The council should have regard to green and blue infrastructure on development sites but it should not seek to extend planning controls over agricultural and rural land.

Question 9B

Natural Environment (page 120)

The restoration and creation of new areas of habitat in association with development must be proportionate and have regard for food production. Displacing food production from productive landscapes merely exports our food production and therefore is environmentally questionable. We need to be able to produce food locally in order to meet our own needs and those of future generations. We are concerned that moves to create large areas of habitat with bigger

mitigation areas will result in higher food imports from other areas of the world that do not produce food to the same environmental and animal welfare standards as UK farmers.

Question 9F

Productive landscapes (page 122)

We are very encouraged that the Issues and Options paper repeatedly states the importance of food production. However we are disappointed that in paragraph 9.28 you have chosen to only focus on the perceived negative impacts of intensive agriculture. It is very frustrating for farming communities when they are only perceived as a problem rather than the solution to many of our future challenges. It's also concerning that your solution to these problems is to encourage individuals to grow food. While this is a worthwhile activity which we support, you also need to follow this up by supporting local farming businesses.

Question 9F does not include any support for food producing businesses which is a huge missed opportunity and so we recommend that this section is re written. Any policy on productive landscapes should be practical and support farming, within the context of environmental and landscape benefit, including climate change adaptation. Local farm businesses should be supported as producers of sustainable local food and key delivery mechanism for landscape and biodiversity assets. The policy should include support for farm infrastructure improvements, some of which will be regulatory requirements to protect the environment and is necessary for food production. These could include but is not limited to; new muck/slurry storage infrastructure to protect the water environment and reduce ammonia emissions, new grain storage facilities to meet food hygiene standards, new livestock and dairy housing to meet the latest standards on animal welfare.

Question 9.1

Historic Environment

Paragraph 9.38. Hedgerow removal happened in the past and peaked during the mid 20th century. In recent years farmers have planted considerable numbers of new hedgerows through their own initiative and via participation in agri-environment schemes. Again, we are disappointed that agriculture is portrayed as a problem and the many improvements that have been made over the past 20 years have not been acknowledged. Every type of farm continues to carry out a huge amount of work to protect and enhance the landscape, encourage wildlife,

benefit soil and water, and reduce their impact on the climate. With agriculture occupying over 70% of the UK landmass, farm businesses play an irreplaceable role in looking after our cherished natural environment.

We are very concerned by the options outlined in 9.1 particularly *“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?”* We strongly disagree with this proposal as it could be interpreted as an attempt to extend planning controls over agricultural activity.

The second proposal *“Take a broader and more inclusive approach by explicitly encouraging the recognition of currently undesignated heritage assets, settlement morphology, landscape and sight lines?”* is also problematic. Working farms are surrounded on all sides by open fields and woodland. Therefore it may not be practical for development to avoid impacting on landscapes and sight lines.

Both of these policy options have the potential to stifle rural development and the rural economy especially as some infrastructure improvements will be regulatory requirements to protect the environment and is necessary for food production.

Other issues:

Landscape Character and Cannock Chase Area of Outstanding Natural Beauty (AONB)

Given that large areas of the District are either designated or in close proximity to AONB or Green Belt it is important that some provision is made to support rural businesses when they need to invest in new infrastructure and modern agricultural buildings. Environmental compliance and animal welfare standards are changing and it is important that these businesses are able to evolve in order to meet them. These businesses play a vital role in maintaining the landscape and their activities provide a wide range of public goods.

Wider Environmental Impacts of Development

Large new developments in urban areas have the potential to cause downstream impacts, even when new SUDs techniques are employed. It is important to recognise that farmers have to deal with these impacts as they are responsible for maintaining many of the area's watercourses and drainage infrastructure. Waterlogging and flooding has the potential to directly impact upon the productivity of agricultural land so it is important to value and maintain our existing drainage infrastructure.

The proposals for growth outlined in the document could lead to large new housing and employment developments in the urban area but despite the reference to the importance of flooding, scant information is provided on the downstream impacts.

The paper does not examine the additional demands that will be placed upon water abstraction or sewerage treatment capacity in the area. Again these are areas that may impact upon adjacent farm businesses and we would welcome more information on how potential impacts will be mitigated.

Livestock units and residential development

Where sites are allocated for development, the proximity of the land to existing livestock units must be examined. Sites should not be allocated for residential development if they are found to be in near proximity to an existing livestock unit. Farms can be sources of noise and odour and therefore neighbouring land could be unsuited to residential development. We are keen to ensure that development in the countryside does not result in conflict between new residents and existing farm businesses.

Agricultural Workers Dwellings

The document does not include any reference to rural or agricultural workers dwellings. This is a significant omission and could be detrimental to the development of agricultural businesses. The revised NPPF states that the needs of groups with specific housing requirements be addressed. It also outlines an exemption allowing a new dwelling for new entrants taking on a farm and measures to accommodate additional worker homes on farms.

Therefore it is critical that the Council addresses this omission and sets out a policy to take into consideration the housing needs of people employed in agriculture and rural businesses, particularly when those businesses are located within the green belt.

Thank you for the opportunity to respond to this consultation and we hope that these comments are helpful and will be taken into account.

Yours faithfully

Sarah Faulkner
Regional Environment Adviser

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS CONSULTATION DOCUMENT – RESPONSE BY SEIGHFORD PARISH COUNCIL

SECTION 5 THE DEVELOPMENT STRATEGY

5A	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.
	Answer: a) Yes b) Yes
5B	a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough’s future housing growth requirements? What is your reasoning for this answer? b) Should a Partial Catch Up rate allowance be incorporated? What is your reasoning for this answer?
	Answer: a) 540 dpa - this provides a reasonable margin over the optimum figure of 500dpa b) It is considered that a Partial Catch Up rate allowance should be incorporated because until the Covi-19 crisis, we were finally emerging from the 2008 recession and the trend showed that young people were able to form their own homes.
5C	In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031? If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)? Please explain your reasoning.
	Answer: Yes – it is suggested that by using a discounted figure of 5500 should ensure that the new Local Plan is secure.
5D	i. Do you agree with the basis for the preparation of the 2019 Settlement Hierarchy? ii. Do you agree that the smaller settlements should be included in the Settlement Hierarchy?
	Answer: i.) Yes ii) Yes
5E	The northern built up areas of the Borough are not properly recognised in the currently adopted Plan - most notably Blythe Bridge, Clayton and Meir Heath / Rough Close. Should these areas be identified in the Settlement Hierarchy for development?
	Answer: Yes
5F	a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed? If not, what alternatives would you suggest? b) Are there any of these spatial scenarios that you feel we should avoid? If so, why? c) Which of these spatial scenarios (or a combination) do you consider is the best option? Please explain your answer
	Answer: a) Yes b) Generally Garden Communities because of the substantial loss of prime farming land with the exception of Meecebrook which it is understood comprises mainly brownfield land. c) Intensification around the edges of the larger settlements and strategic extensions - infrastructure costs will be lower with support to existing services and more satisfactory links to public transport networks.
5G	Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough’s future housing and employment land requirements? If you

	do think the Garden Community / Major Urban Extension approach is appropriate which of the identified options is most appropriate? Please explain your answer.
	Answer: Yes - the Meecebrook Option is the most appropriate and meets the long term objectives of the New Local Plan.
5H	i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)? ii) If you do not agree what is your reason? iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.
	Answer: i) Yes ii) - iii) No
5I	Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan? Please explain your answer.
	Answer: Yes – Meecebrook as already cited is considered to be the only satisfactory Garden Community option.
5J	What combination of the four factors: 1. Growth Option Scenario (A, D, E, F, G); 2. Partial Catch Up 3. Discount / No Discount 4. No Garden Community / Garden Community Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process? Please explain your answer.
	Answer: Growth Scenarios D & G without garden community are considered to be the preferred option because they meets the housing requirements and delivery options.
5K	Do you consider the EDHNA recommendations for an Employment Land requirement of between 68-181ha with a 30% (B1a/B1b) : 70% (B1c/B2/B8) split reasonable? If not, what would you suggest and on what basis?
	Answer: Yes
5L	Do you agree that the assumptions made in the EDHNA about the need to replace future losses of employment land are reasonable? If not, please explain why
	Answer: Yes
5M	Should the New Plan broadly mirror the spatial distribution for new employment prescribed by the current Plan? If not, what would you suggest and on what basis?
	Answer: Yes
5N	Do you consider the employment distribution proposed by Table 5.9 for a New Plan without and with a Garden Community / Major Urban Extension to be reasonable? If not please explain your reasoning.
	Answer: Yes
5O	Are there any additional sites over and above those considered by the SHELAA that should be considered for development? If so please provide details via a “Call for Sites” form* * https://www.staffordbc.gov.uk/node/227026
	Answer: No – the sites put forward are more than adequate to meet the requirements of the New Local Plan 2020-2040.
5P	Do you agree that settlements of fewer than 50 dwellings should not have a settlement boundary? If not, please provide reasons for your response including the specific settlement name.
	Answer: No. Settlements of fewer than 50 dwellings should have a settlement boundary. This provides clarity and certainty for developers and others by highlighting areas which will be more acceptable for new built development. It is proposed that the hamlets of Shallowford and Coton Clanford are included in this category
5Q	Do you agree with the methodology used to define settlement boundaries? If not please

	provide reasons for your response.
	Answer: Yes

SECTION 8 DELIVERING HOUSING

8A	Should the council continue to encourage the development of brownfield land over greenfield land ?
	Answer: Yes, we consider it is imperative that previously developed land is used in preference to greenfield land for the prime reason that greenfield land is a rapidly shrinking and irreplaceable resource and the first consideration should be to preserve our wonderful countryside in Staffordshire.
8B	Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough? If so, do you consider: the implementation of a blanket density threshold; or a range of density thresholds reflective of the character of the local areas to be preferable? Why do you think this?
	Answer: Yes, we consider that a range of density thresholds would have a beneficial impact on development within the borough to reflect of the character of the local areas and the type of housing.
8C	Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the area?
	Answer: Yes, we agree that densities should reflect the sustainability of transport available in the area.
8D	Do you consider that the adoption of the Nationally Described Space Standards would work to increase housing standards and therefore enhance the health and wellbeing of local residents in Stafford Borough ?i
	Answer: Yes, we consider that it is imperative that housing standards are improved and by adopting the Nationally Described Space Standards it ensures that adequate space is provided in dwellings which is a key factor to the improvement of the health and wellbeing of communities.
8E	In the New Local Plan should the Council a) Apply the Nationally Described Space Standards to all new dwellings, including the conversion of existing buildings? b) Only apply the Nationally Described Space Standards to new build dwellings? c) Not apply the Nationally Described Space Standards to any development? Please explain your answer.
	Answer: a) Yes b) No c) No - By applying the Nationally Described Space Standards to all new dwellings including conversions avoids the situation where developers are using Permitted Development Rights to convert office buildings to residential use that have created conversions of low quality.
8F	Do you consider that the housing mix detailed in the table above will be sufficient in meeting the needs of all members of the community?
	Answer: No – we consider that greater emphasis should be placed on the provision of affordable housing in the form of 2 bed starter homes and the mix for this type should be increased to 50%.
8G	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?
	Answer: Yes – we consider that this applies to most of the smaller villages in the Borough.
8H	Should the Council consider a policy requiring 10% of affordable homes delivered on new major development sites to be wheelchair accessible?
	Answer: With an ever increasing aging population, we consider that it is of paramount importance that a policy is introduced requiring 10% of affordable homes delivered on large scale new development sites to be wheelchair accessible.

8I	a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development? b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens? c) Is there a need for bungalows to be delivered in both urban and rural areas? d) Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?
	Answer: a} Yes – there has simply been a complete absence of bungalows built on major developments within the Borough during the last thirty years despite an ever increasing demand for this type of accommodation and we are of the opinion that the Council should adopt a policy of requiring a minimum of 20% of dwellings being bungalows. b) We consider that the plot size for bungalows in this situation be reduced by limiting their garden size. c} Yes d} to ensure that there is an adequate supply of accommodation with specialist care facilities.
8J	Do you consider that there is no need for additional provision of student accommodation within the Borough?
	Answer: Yes
8K	a) Do you consider an affordable housing provision of between 252 and 389 units per annum to be achievable? b) In the instance whereby a lower provision of affordable housing is sought, would the supplementary supply of a diverse range of market housing in accordance with the findings of the EDHNA be sufficient?
	Answer: a] Yes b] Yes
8L	Should the council require affordable units to be delivered on sites with a capacity of less than 5 units in designated rural areas?
	Answer: Yes
8M	In order to help maintain the potential supply of land for rural affordable housing should the Council, where development has not yet commenced, convert existing Rural Exception Site Planning Permissions to Rural Affordable Housing Site Allocations?
	Answer: Yes
8N	a) Should the council introduce a policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes? b) Should the council allocate plots for the purpose of self-build throughout the borough?
	Answer: a} Yes b} Yes
8O	a) Do you consider that the approach detailed above will be beneficial to the smaller settlements of the Borough of Stafford and their residents? b) Do you think it would be beneficial to only allow people the ability to build their own homes in smaller settlements if they have a demonstrable connection to the locality of the proposed development site?
	Answer: a} Yes b} Yes

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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Mr	
First Name	Douglas	
Surname	Rouzel	
E-mail address	[REDACTED]	
Job title (if applicable)		
Organisation (if applicable)	Stafford and Stone Green Party	
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.

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	4.A	Other	P34
2. Please set out your comments below					
<p>A) The recent history of changes at a national level to the standards to which housing is built have move significantly away from moving towards a zero carbon future. Stafford Borough Council have identified a desire to move in this direction in their Climate Change Plan. A significant amount of climate related impact which the council can have in the long term can be found in it’s approach to building standards and this is an ideal opportunity to put in a set of requirements to go beyond the very low standards mapped out in the statutory building regulations. There are a number of different third party standards which could be determined to be relevant to the local area, like BREEAM and Passivhaus. We would encourage the Borough to adopt the use of one of these standards in their local plan and implement a requirement for significantly higher standards of properties in our local area.</p> <p>B) In addition to building to higher standards, the biggest impact that the local plan can have on climate change mitigation is with regards where development is permitted and the transport links which those locations have – in particular with regards to the need for those new home owners to use a car in their day to day life. Transport is one of the most significant areas of contribution to climate change which can be addressed at this level, and the local plan requiring much higher standards in terms of accessible, affordable and convenient green transport links (almost anything but private cars) would be a significant step forward for the borough. The current approach seems to be agnostic to the need for private cars and many of the new developments are placed in ways which can only make congestion in the local area worse, and this is something which the local plan needs to reverse.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	4.B & 4.D	Other	P35
2. Please set out your comments below					

The local plan should set out a vision where by a wide range of renewable energy provision is within the envelope of what is permissible at a local level. At a house by house level, personal solar and wind developments as well as ground source heat pumps should not only be permitted but encouraged.

In terms of large scale development the local plan should be open to development of both onshore wind and solar farms in locations across the borough, and the local plan should take a generally permissive approach to this type of development if it's commitment to addressing climate change in the timescale which is required is to be taken seriously.

Map 13 of the previous local plan set out a number of locations which had "wind potential" within the borough – and this provides a reasonable starting point for possible locations. There should be work done to identify locations which would be suitable for solar development as well across the borough, and the specific locations should be primarily focussed on what will provide the most efficient location for wind or solar energy without impacting directly on the areas of the borough of specific interest because of their biodiversity and conservation value.

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

Section		Paragraph		Table	
Figure		Question	4.C	Other	P35

2. Please set out your comments below

There is a significant benefit to the overall climate impact to the implementation of such a rule at a local level, however this should only ever be *in addition* to higher standards for energy efficiency, insulation and design standards because these represent the "low hanging fruit" for delivering the borough's zero carbon vision.

So yes, there should be a requirement for large scale developments, both non-domestic (above 1000sqm) and domestic (10 units and above) to include an onsite provision for renewable energy generation which should provide at least 20% of the sites energy needs. This should be focussed on the larger side of generation to ensure the economies of scale and efficiency, as well as long term viability and minimising maintenance on costs for the future.

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

Section		Paragraph		Table	
Figure		Question	4.E	Other	P36

2. Please set out your comments below

The statutory building regulations, since the changes under the coalition government, have not been focussed on delivering the level of environmental impact which it is now clear we will have to deliver if we are to avoid significant impacts from climate change, and in light of this, it is important that the local plan adopts a position well ahead of the requirements in the statutory building regulations, and look to require a third party standard of water efficiency like the BREEAM standards for water efficiency.

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

Section		Paragraph		Table	
Figure		Question	6.22	Other	94

2. Please set out your comments below

Paragraph 6.22 sets out three brownfield sites within the Green Belt which are encouraged for limited infill or redevelopment. The fact that these sites are within the green belt should mean that any proposed developments within this are held to higher standards of design and consistency with the surrounding areas, in particular from a visual aesthetic perspective, but also from an environmental impact perspective – any developments in these areas should have, as far as practicable, a positive impact on the wider ecology of the local area, and should not promote activities like excessive reliance on private motor vehicles usage in their associated activities.

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.A	Other	P117

2. Please set out your comments below

- a) Yes – the borough should definitely have a clear policy that addresses green and blue infrastructure, this is something which needs a clear direction of travel and effective planning to ensure that there is a coherent network of green space across the borough, and that fragmentation and dividing up of green space by new development does not cause problems for the natural environment. The inclusion of wetland and water in this planning is essential for the borough as there is a significant number of areas where this is a significant part of the boroughs green assets.
- b) The plan/policy should definitely identify specific opportunities to fill in green infrastructure to build a more coherent network of green space across the borough.

In addition to the specific answers to both of these – there needs to be more clear targets and monitoring of this area (see answer to question 14.A) so that this is something which the borough can be held to account on and ensure it is effectively delivering.

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.B	Other	P120
2. Please set out your comments below					
<p>The plan policies should be directly rooted in the approach taken in the Borough Nature Recovery Network report – using evidence and a clearly principled system of assessment of the green space to identify strategic areas which can provide opportunities to have an impact on the existing infrastructure.</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	9.C	Other	P120
2. Please set out your comments below					
<p>a) Yes, absolutely – this is something which needs to be done in order for the borough to deliver on its climate change ambitions, as well as the ability to maintain the ecological health of the borough.</p> <p>b) –</p> <p>c) Monitoring and review is an essential part of ensuring long term delivery on the principles within the plan, as well as ensuring the overall approach is successful, and provide opportunities to make changes to those specific plans rather than leave them in stasis once the plan is approach. In light of this, it is essential that monitoring and review must be a central part of the long term planning of green space.</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	9.E	Other	P122
2. Please set out your comments below					
<p>The approach outlined in 9.25 does not go far enough in setting out the principles which any future tree strategy will deliver. The local plan needs clearly identifiable tree cover targets and a commitment to delivering those through the levers available within the borough. As it stands, the proposed approach falls short of the level of commitment needed to genuinely deliver on the councils climate change ambitions.</p> <p>9.25 b sets out that adequate protection will be provided to existing trees – this suggests that there is not currently adequate protection in place – which if true is a sad indictment of the current situation – but if there is a genuine desire to deliver the level of increase in tree cover needed within the borough then “adequate” protection is simply not going to be</p>					

enough – the existing tree cover will require robust and active protection.

9.25 b outlines that any development which provides an opportunity to increase tree cover will be required to do so – but it doesn't outline to what extent. This needs to be clearly articulated at this point – to ensure that developments are incentivised to deliver at or above their proportional contribution to the overall increase in tree cover within the borough.

Tree cover also needs to be included in the measures around green space and or climate change in table 14.1 within the plan so that it is clear that there is a distinct target to achieve.

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.G/H	Other	P124

2. Please set out your comments below

This use of Special Landscape areas should only be used where they can genuinely provide additional protection to something which needs protecting, and they should not be allowed to be used in order to stop the development of, for example, and indeed, in particular, windfarms.

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.M	Other	P129

2. Please set out your comments below

Yes, there are a number of sites within the borough which would significantly benefit from being designated local green space in the local plan. The extensive developments in the borough could have been more clearly broken up and have a less intense impact on the local area if there were a number of green spaces within that which had been protected in this way. Spaces like the football fields or the old cricket pitch in Doxey are spaces which immediately come to mind as spaces which need this designation applying.

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

Section		Paragraph		Table	
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Figure		Question	10.A	Other	P134
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2. Please set out your comments below

- a) Yes – the borough’s current provision for electric car infrastructure is not sufficient to accommodate the average electric car usage across the borough and will therefore stifle inward travel from users of such vehicles which could harm economic growth in the borough. In addition to this, there is no current plan to increase the provision – which means that this problem will become more acute as the take up of electric vehicles increases. Including the provision of electric charging points in all major developments seems like a useful step forwards. That said – this is not a measure for dealing with air pollution per se – a number of particulate pollutants come from tyres, and electric cars still use these.
- b) This is absolutely imperative if the borough is to have any chance of meeting it’s climate change ambitions. The lack of decent public transport provision is already a significant problem in some of the developments in Stafford, and hampering the affordability of even the most affordable houses. Public transport provision must be a significant part of all planning decisions where there are 10 dwellings or more.
- c) The employment of air quality management zones should not be restricted to only areas of notable biodiversity importance – it should be extended to the places where the most vulnerable people in our society can potentially come into contact with dangerous pollutants – like school playgrounds and retirement homes. Air pollution is not simply something for protecting biodiverse areas – although they should be protected, air pollution is a serious health risk and we should be looking to combat it on those terms.

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	10.B	Other	P134

2. Please set out your comments below

This question assumes that any mitigation scheme will be effective in avoiding the disruption and destabilisation of these vulnerable ecosystems. If there is a genuine risk of this happening due to a major development then there should be sufficient policy in place to refuse developments on those grounds, rather than allow them to go ahead and build it with some sort of token gesture towards mitigation elsewhere.

This is certainly something which should be applied, but it is clear that any such a measure would likely be insufficient to actually protect our precious local ecosystems.

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	12.A/B	Other	P144

2. Please set out your comments below

The general principles of what is set out in the plans for transport are good, however there is no clear direction of how this will be applied in practice, and how easy this ambition will be to circumvent when it comes to approving developments. This lack of clear ability to robustly apply these principles to developments means that they come across as having a fairly low ambition in the long term, and will not genuinely serve to deliver the low carbon future which the borough so desperately needs.

12.B

- a) The local plan has a significant number of potentially development opportunities within it which may well fall within the rural areas outlined in section 12.5 – which the document effectively puts beyond the possibility of being offered a more diverse range of transport options. This seems contradictory to the overall aim of reducing the use of personal cars – an ambition which we fully support. Rural locations should not be considered beyond the scope of this, they should simply have a different mix of public and active transport links in their planning and developments considered, and the provision of local essential services (and in the current climate we are discovering what those really are – schools, health care and basic grocery shopping) to mitigate the need for high levels of travel are something which should be very carefully considered.
- b) We fully support the need for high quality walking and cycling networks within the borough, however, high quality walking and cycling networks need to go to places which people want to go, and be easier to use than existing infrastructure (e.g. the standard road network). This means that focusing all new active travel infrastructure on new development will not deliver what is required. It needs to be developed across the key transport corridors within the town, and take people to and from where they need to get, quickly, safely, and easily.

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	12.E	Other	P146

2. Please set out your comments below

There is a real need to set out a clear policy for electronic communication infrastructure for Stafford Borough, and it is welcome that it is being considered in this local plan. The global pandemic has taught us that internet connectivity has fast become an essential service up there with electricity, gas and water and access to it is needed across all walks of life.

In addition to its new status as an essential service, there is obviously the potential climate impact on the ability of people to work from home, the transport ambition is something which can be more easily delivered if people are more able to work from home, and the pandemic has taught us that many more people than have previously worked from home, can work from home – and if internet connectivity is improved, then this will be significantly easier and decrease the need for travel to work.

The extent to this infrastructure needs to be driven on a “need” basis, rather than the market, and developments need to have quality internet connectivity built into their requirements from the earlier planning stages in order to ensure they are future proof. This can be spread across both the latest generations of mobile internet technology, as well as fibre connectivity, but the important thing is that there are no “not-spots” in our borough.

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	14.A	Other	155

2. Please set out your comments below

There are no issues which we have identified with the overall approach to monitoring and reviewing, however there are a number of areas which could be better developed and improved, and some areas which very much need to be added to the monitoring and reviewing regime.

In particular, the following areas need to be included in order to increase the level of ambition within the councils activities:

Tree cover, as outlined in our response to question 9.E is an area that would significantly benefit from a clear monitoring and review regime.

The other area where a closer regime of monitoring and review could be used is within the use of public transport and active travel options. There is a provision for developments with secured travel plans, however this is no specific to plans which prioritise the decrease in public car usage. This is also focussed on new development, rather than on the delivery of joined up infrastructure across the borough, which is what is needed in the case of active travel options.

Part B: Your Comments

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

Name Douglas Rouxel	Organisation Stafford and Stone Green Party
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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	3.b	Other	P27

2. Please set out your comments below

A shorter vision is only useful if it is used to make the overall plan more accessible and provides additional value to all stakeholders. The opinion that the previous vision is “too long” is a poor reason to make changes – changes should be based on suitability and usage. A longer vision provides more detail and less opportunity to be misinterpreted to circumvented.

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	P27
2. Please set out your comments below					
<p>Yes an explicit need to recognise and combat climate change is required. However, growth in general is not compatible with combatting climate change. The commitment to deliver net zero carbon by 2050 is far too slow to tackle what is the most pressing crisis of our time. The imperative for sustainable growth does not go nearly far enough.</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	3.F	Other	P30
2. Please set out your comments below					
<p>Yes – Climate Change should have its own thematic objectives in order to ensure that climate change objectives and commitments to net zero are truly embedded in the planning process and not side-lined for expediency. The objectives set on climate change would provide a defined and measured way to assess the impact of the local plan and any subsequent growth and building through a climate lens.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section		Paragraph	4.11	Table	
Figure		Question		Other	P34
2. Please set out your comments below					
<p>The local plan providing a path to carbon neutrality by 2050 is far too late. The accepted science by the IPCC (Intergovernmental Panel on Climate Change) demonstrates the carbon neutrality target should in fact be 2030 and any further delay would result in wholly irreversible destruction of our environment. Stafford Borough Council in their own Climate Change Strategy reference this report and the 2030 date so this needs to be the target used.</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	5.C	Other	P44

2. Please set out your comments below

Yes, a discount should be applied of the full 6,000 new homes currently accounted for. This provides continuity between the current adopted local plan and new local plan. It also ensures that the approach to building and development is thought through in the context of housing development already planned or completed.

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

Section		Paragraph		Table	
Figure		Question	5.D	Other	P49

2. Please set out your comments below

i. The overall hierarchy should not have as a basis the ‘suitability and attractiveness to the market’ but instead be formulated around a principle of need. Those people most in need of employment and suitable housing should be at the forefront of the formulation of the settlement hierarchy, as opposed to the abstractness of markets and growth. The hierarchy as a result of the principles used is focused around villages and settlements with already higher than the borough average house prices and little to no public transport accessibility. This makes the settlement hierarchy look out of step with the lives and employment activities of people already resident in Stafford much less those who will reside here in 2050.

ii. The small settlements that have been included in the hierarchy have a focus on the west of the borough and areas near the M6 corridor adjacent to Stone. This, if developed significantly in future house building will place additional pressure on already overstretched and inadequate transport infrastructure. No proposal is contained within the consultation regarding where the additional housing will be built if the small settlements are not included. This is crucial as there are opportunities within the large settlements to build on additional brownfield sites and address the complete lack and side-lining of affordable and social housing overall in the consultation. The document says that the threshold of affordable housing may not be reached with no strategic plan or adjustments in the priorities to address this. This cycles back to the needs of people to be at the forefront of the settlement hierarchy and not the market or profits for developers.

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

Section		Paragraph		Table	
Figure		Question	5.E	Other	P50

2. Please set out your comments below

These should only be properly included in the settlement hierarchy on the basis of need and public transport connections. This would involve liaising and working more strategically with Stoke-on-Trent City Council on economic development and public transport infrastructure. These areas should only be included in the hierarchy on the basis that such work collaboration is actively taking place.

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

Section		Paragraph		Table	
Figure		Question	5.F	Other	P53

2. Please set out your comments below

‘Spatial Scenarios’ – Intensification of the town, dispersal of development, strategic extensions, wheel or string settlements, all suggest there is more space to exploit and all scenarios suggested make no reference at all to biodiversity or protection of green spaces for either wildlife or leisure for children or adults.

Given that the council has already sanctioned well in excess of the minimum of 483 houses per year, no further development should be considered until the long term implications of the current rate and scale of development is reviewed in the light of the climate emergency and the loss of biodiversity across the borough and the county.

More environmentally friendly and sustainable practices need to be adopted; more, not fewer green spaces, and much less destruction and fragmentation of habitat if we are to mitigate climate change over the long term.

The council refers to the need to improve air quality yet the proposed developments all require increased car use. There are no cycle routes, children’s play areas or spaces for dog walking in the proposed developments which would contribute to improving the health and well-being of residents.

If the proposed ‘Garden Community’, is to set new and higher standards of healthy living and clean air and, ‘follow the Garden City principles’, the council must articulate how the proposed developments will provide ‘peaceable, livable environments, replete with nature and open space, which will require an understanding of what nature needs to thrive and how residents will be enabled to take ownership of their local space.

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

Section		Paragraph		Table	
Figure		Question	5.G	Other	P56

2. Please set out your comments below

Yes, the consideration of Garden communities and or urban extension would be useful in determining the approach to meeting the housing and employment requirements of the borough. However, in identifying which one of the options is most appropriate it is important to consider any possible alternatives in location and provision. It is also important to consider the significant infrastructure requirements needed for the successful construction and functioning of Garden Communities.

The urban centre of Stafford, in particular the land close to the new Western Access Road and the train station doesn't appear to have been considered for an urban garden community which could provide a mix of housing, occupancy types, and employment land. This could provide independent small manufacture and retail opportunities. This would provide different accommodation and usage to the new housing stock that has been built over the last 15 years around Doxey, and Castlefields in Rowley. This could address significant housing needs for those on middle and low incomes, those who commute in and around the borough, and with a proportion of affordable and social housing built on sites in an existing more urban brownfield area. This area may not be the only option through which the garden community can be explored in a more urban setting.

Should the Garden Community/Major Urban Extension's inform and shape the provision of housing and employment land for the borough there should be a number of threshold stipulations that these developments should meet, which will ensure their success and sustainability.

1. Large-scale renewable energy production should be proximate to any new developments of that size with either solar, wind, hydroelectric or a combination of the above to provide a base load of power to each dwelling and employment structure. This prevents the need for individualised renewable production e.g. a solar panel on a house, providing greater economy of scale and potential to generate excess power to be supplied to the grid. The previous local plan identified potential sites for windfarms, some of which are proximate to proposed Garden Community sites. These should be progressed in development in order to increase the amounts of renewable power generated in the borough which will contribute to the fulfilment of the borough Council Climate Strategy.
2. Public transport infrastructure is of incredibly high importance to any proposed development in all the garden community options. If the main focus of transport accessibility is proximity to connecting A roads and motorway junctions then the council will have completely failed not just in its climate responsibilities but also in its responsibility to connect rural areas, support those with access needs, and provide transport options those on lower incomes, as well as school and college age young people. Working with the county council to ensure reliable and frequent bus provision that is financially accessible will transform the borough. There are still opportunities to apply for funding from central government for such infrastructure improvements for garden community developments.
3. Outside of public transport infrastructure there needs to be planned a deliberate provision of walking and cycling routes to encourage travel into the town centre and to local schools via walking and cycling. It is proven that sharing cycling routes only with main roads discourages many who would normally cycle journeys less than 3 miles.

4. If a garden community is beyond a certain size it will require at least primary and additionally secondary school provision. It is vital that such schools are local authority schools managed by the county council and not academized, and additionally are adequately funded to support the learning of our young people and resources and support to teachers and school staff.

These issues again will require a joined-up approach with Staffordshire County Council to ensure that there is the strategic and holistic approach being taken to secure the economic future and sustainability of the borough. This will ensure the continued sustainable provision of good quality affordable housing and meaningful employment for residents in Stafford and Stone whilst meeting our commitments to reaching net zero carbon by 2030.

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

Section		Paragraph		Table	
Figure		Question	8.A	Other	106

2. Please set out your comments below

Yes – the council should continue to not only prioritise brownfield development but aim for this to be the case for a very high percentage of new developments. Maintaining the green space in our borough is highly important.

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

Section		Paragraph		Table	
Figure		Question	8.C	Other	P107

2. Please set out your comments below

Yes – the development of areas should be designed to support not only sustainable but also affordable public transport options. In addition, this would not simply increase density close to Stafford and Stone stations but also be designed to maintain and increase local bus services. Finally, the density shouldn’t only be reflected in the existing availability of sustainable public transport but also drive the development of new public transport infrastructure in areas where it has been cut or is lacking. This should also lead to monitoring of transport options.

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

Section		Paragraph		Table	
Figure		Question	8.D/E	Other	P108

2. Please set out your comments below

How big are dwellings currently in Stafford, and how does this correlate with pricing? Health and wellbeing is not just about amounts of living space but access to outdoor areas/a garden, public parks and green space, quality of not only existing but new housing stock, affordability and sufficient maintenance where housing is social housing or sold for private renting. This is not a question that can be answered without demonstrating the current levels of space, quality and affordability of homes in the borough and needs more information to be provided in order to form a complete judgement.

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

Section		Paragraph		Table	
Figure		Question	8.H	Other	P108

2. Please set out your comments below

Yes – in addition care should be taken to ensure that homes are accessible and can be adapted to wide range of other mobility issues and disabilities and not restrict accessibility provision to only wheelchair users. At minimum 10% should be accessible for wheelchair users but plans should be made to go beyond that minimum. It is vital to go beyond the minimum to ensure accessible housing is readily available across the borough and that it remains affordable for all.

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

Section		Paragraph		Table	
Figure		Question	8.K	Other	P112

2. Please set out your comments below

a – Yes, not just achievable but desperately needed. Without the appropriate level of affordable housing being available there will be an inequality in the labour market due to workers being unable to afford living in Stafford. This will result in a lack of local economic growth required by the council within the borough due to the mix of employment required within the area.

Is this being monitored to the standard and level that is required?

b – No, there should be no reasonable excuse for the level of affordable housing required to not be met. There should be no seeking of a lower level of affordable housing by the council at any time.

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

Section		Paragraph		Table	
Figure		Question	8.L	Other	P112

2. Please set out your comments below

Yes, as long as those rural developments are not being built on greenbelt land. Additionally, these rural affordable houses should be in addition to the other affordable housing already required in planning frameworks, with sufficient public transport links provided by the county council and for these houses not to be transferred from requirements of other sites where house prices are higher. Affordable and social housing needs to be integrated into every development at the same standard and quality as all other housing stock in the developments.

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

Section		Paragraph		Table	
Figure		Question	8.M	Other	P112

2. Please set out your comments below

Maintain these sites as Rural Exception Sites but move to implement the following provisions in the new local plan for Community Led Housing (CLH). Local authorities in rural areas can take a less traditional approach to Rural Exception Sites by including in their Local Plans a presumption in favour of genuinely community-led schemes. For example, East Cambridgeshire District Council’s Local Plan states that there will be a presumption in favour of genuine community-led development schemes, even on land not identified for development and including on land outside of development envelopes; ie Rural Exception Sites

Review current Rural Exception Sites with a housing need survey and ensure that the provision is still needed in the current locations and that there are not different areas of need since the previous plan. Halt all other potential planning permission on all other greenbelt land to prevent any other greenbelt sites being sold for market housing.

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

Section		Paragraph		Table	
Figure		Question	8.N	Other	P113

2. Please set out your comments below

A – Yes as long as the percentage availability does not take up space that could or would otherwise be made available for affordable or social housing.

B – Yes with the stipulation that the planning permissions for the self-build homes require them to be built to the highest environmental standards with provision for connection to renewables. Any passivhaus projects to be given priority over other types of house build.

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



Staffordshire
Chambers of
Commerce.



Stafford
Chamber of
Commerce.



REF: SW/vh
Monday 20th April 2020

Mr Alex Yendole
Planning Policy Manager
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Dear Alex

Stafford Borough Council Local Plan 2020 to 2040 - Issues & Options Consultations Document, February 2020

Thank you for inviting Stafford and Staffordshire Chambers' of Commerce to provide feedback on the Stafford Borough Council Local Plan 2020 to 2040, Issues and Options Consultations Document, February 2020.

Staffordshire Chambers' of Commerce is the voice of the business community in Staffordshire. With more than 1,200 member businesses across the county and beyond, we represent our Members' views on the local, regional and national issues affecting their businesses. A significant number of our Members are based in the Stafford Borough area and we therefore welcome the chance to provide feedback on your Local Plan 2020 to 2040.

Having reviewed the Issues & Options Consultations Document, the Board of Stafford Chamber of Commerce feel that the Plan would benefit from having a stronger expression of a vision for the Borough. Such a vision would help to create a foundation for the Local Plan and is something that stakeholders could embrace as the Borough looks to support further economic growth and attract new business into the area.

The wealth of Stafford Borough and its people largely comes from incomes/revenues generated by a prosperous business community and as such, any strategy (including a business strategy), is vital. The Board would suggest that business is the key to housing, social and economic growth.

High quality and diverse design through developments will be a very important part of reinforcing the brand image of Stafford Borough within our region and can indeed set us apart as somewhat more progressive and pioneering, should it be desired. Also, businesses look to the Local Authority for a strong and efficient, as well as welcoming, planning system. We have it on first-hand account, the value that businesses place in having such a local authority relationship.

There are established metrics for the measurements of each of these, although the Borough may, through its planning process, propose an alternative framework to ensure that, for instance, large housing developments are not designed repetitively but are creating really great places for the future residents of the Borough to live and work.

“Section 4 – Sustainability and Climate Change – 4.4 states: “With this in mind, it is important to ensure that the new Local Plan for Stafford Borough guarantees that all development delivered within the borough contributes to the creation of a greener, more sustainable and more resilient environment””

Sustainability in all its forms is an increasingly important issue for businesses. Stafford Chamber Board would be interested in helping to create or comment on any overarching green strategy for the area.

Stafford Borough is home to a diverse mix of businesses across a wide range of sectors. The local business community includes start-up enterprises, world renowned exporters, incredibly innovative digital/tech businesses and given the excellent connectivity of the area, a growing number of logistics premises. There is a need to ensure that future developments across the Borough continue to attract a good balance of business sectors.

“Table 6.1 Summary of employment and employment space requirements (20202040 (pg 90)” has three possible scenarios around employment space requirements. The Board feels that Scenario 2 is the most suitable.

The Board would like to reiterate the comments that were made to you at the Local Area Advisory Board meeting in March; Specifically, the amount of future employment land to become available of 68-181 hectares. The Board continue to believe that this level would be insufficient.

“Section 1 – Introduction – Panel 6, Pg 10 – “Improved sustainable transport with better bus services to be provided across the borough, including in rural areas””

Businesses based in rural areas and particularly those clustered on rural business parks, are continually finding it a challenge to recruit and retain staff. Regular and reliable public transport is key to addressing some of these challenges.

“Section 1 – Introduction – Panel 6, Pg 10 – “Support for the increased provision of Electric Vehicle Charging Points throughout the borough””

With the Government aiming to bring all greenhouse gas emissions to net zero by 2050, the Board strongly feels that now is the time for investment in more electric vehicle (EV) charging points across the Borough. The current level of public EV charging points in the Borough will not instil the confidence needed by motorists, to switch from petrol and diesel cars, to electric vehicles.

The Board also supports the demand for the creation and enhancement of new and existing walking and cycle paths, to create an extensive network of pathways throughout the Borough. This will help to create more travel to work options for our local communities and encourage more people to walk and cycle to and from work, leading to an improvement in the health and wellbeing of our local population.

“Section 1 – Introduction – Panel 6, Pg 10 “Faster broadband to be provided in all areas across the borough for business and residents, as standard””

All sectors of business rely on e-commerce and this is key to continued prosperity. The COVID-19 outbreak has forced a revolution in terms of what is seen as “the workplace”. Reliable broadband connectivity is key, particularly in some of the Borough’s rural communities, where poor connectivity is seen as the norm. The Board sees better connectivity as a priority.

“Section 6 – Delivering Quality Development – Point 9.37 – “Historic buildings make desirable homes and are attractive as business premises, offering distinctive accommodation and higher rentals per square foot than modern office developments””

The Board feels that there is need to be mindful of the detrimental impact on local rural communities, when converting commercial premises into residential premises. The Board would like to see a presumption to try and ensure that commercial premises are, where possible, retained for business purposes.

“Policy Theme and Questions 5G – “Do you consider that the consideration and utilisation of a new Garden Community / Major Urban Extension (or combination) would be helpful in determining the approach to satisfying Stafford Borough’s future housing and employment land requirements?””

A number of potential sites have been outlined across the Borough, as a new Garden Settlement. The Board is concerned that some of the sites are not appropriate to accommodate a sizeable rise in population and would not be capable of being independent self-servicing communities with local facilities.

“Section 6 – Delivering Economic Prosperity...Enabling new and existing businesses to grow and build confidence in Stafford as a hub of productivity with a balanced economy”

The Board fully supports this aim but feels there is a need to review the mix of business premises available to start-up businesses who may be looking to make that first step from moving a business from residential to commercial premises. In particular, the Board feels that there is a need for more business incubation space, spread evenly across the Borough.

“Section 9 – Delivering Quality Development – the reference to “open space”.

The Board fully believe that the Local Plan should reflect the importance of community spaces. The Board noted that two of these spaces across the Borough (Westbridge Park and Downs Banks) were not referenced in the Local Plan and therefore, neither site is given consideration regarding the pressure created by potential developments on these sites. With regard to Westbridge Park, proposals to improve sports facilities could render the space unavailable and less usable for major community events that are key to the community life of Stone, e.g. Stone Festival, which attracts thousands of visitors into the town each year.

As previously mentioned, Stafford Borough enjoys unrivalled connectivity, easily reached by the M6, A34 and also the West Coast Mainline, conveniently based between the West Midlands and North West conurbations. The Board is delighted to see good progress on further infrastructure improvements in the local area, such as the Stafford Western Access Route (SWAR) and Beaconside but perhaps other major road improvement schemes on the edge of the Borough, could be referenced in the Local Plan. These could include any proposed improvements at Junction 15 of the M6 and also proposals to create a link road from the M54 to the M6 North near Featherstone. Both schemes will help to reduce traffic congestion heading in and out of the Borough.

As a Chamber, we would welcome the opportunity to discuss any of the above points with you further and if this may be of interest, please contact my colleague Declan Riddell

[Redacted]

Yours sincerely

[Redacted Signature]

Sara Williams
Chief Executive

[Redacted Signature]

Carl Croft
President, Stafford Chambers of Commerce

Staffordshire Chambers of Commerce is enormously grateful for the continued support of our Patrons:



E-mail: [REDACTED]

Website: www.staffordshire.gov.uk

Alex Yendole
Stafford Borough Council,
Civic Centre,
Riverside,
Stafford

20 April 2020

VIA EMAIL ONLY

Dear Alex

**Stafford Borough New Local Plan: Issues and Options Consultation
Document February 2020**

Thank you for consulting Staffordshire County Council on your new Local Plan. Our response first covers general comments on the overall requirements and growth scenarios followed by commentary on thematic areas based on County Council Functions.

At Section 3 we agree that the vision should change to become shorter and more concise. The vision should also explicitly recognise climate change given the declaration of climate change emergencies locally and growing national interest in the issue.

The spatially based approach to objectives made sense for the current Local Plan and may continue to do so for the new Plan. However, it is clear that there is potential for some duplication with this approach. A thematic may be more appropriate coupled with specific spatial objectives that are unique to the locality in question.

In relation to Section 4 we note that a joint countywide study is underway in relation to Climate Change, this additional evidence should help shape the policy position in this area.

With regard Question 4A building standards over those suggested in Buildings Regulation are supported. As for part (b) it is hoped that the study referenced



above may be able to provide further detail on potential further policy around climate change mitigation and resilience.

On the subject of renewable energy, we agree that the Plan should make suitable provision towards the transition to low carbon and renewable energy will be of great importance. Again, the joint study referenced above should help in shaping this policy area. Consideration should be given to 'pathfinder' allocations and/or broad areas on search to support any locational policies.

In relation to Question 4D around wind power as the present national position is that wind power generation is only possible of sites that have been allocated in a Local Plan then it follows that if wind power is to form part of the energy mix for the Borough then sites will need to be allocated. The joint study should hopefully establish if there are any plausible locations within the Borough to consider.

With regards Section 5 The Development Strategy it is acknowledged that the EDHNA presents a robust assessment of the options available. The incorporation of a partial catch up seems a plausible requirement based on the evidence presented in the Plan.

Question 5C considers whether a discount should be applied to the housing requirement figure to cater for the 6,000 houses accounted for in the Plan to 2031. Whilst this makes sense to avoid double counting it is considered that the use of the term 'discount' is perhaps misleading. The Requirement to 2040 will be calculated using one of the approaches set out in the EDHNA. The 6,000 units accounted for in the current plan should be considered as part of the supply rather than artificially altering the requirement figure.

The Spatial scenarios tested in the Plan cover all reasonable options, though some may also be plausible in combination with others. As Question 5C refers to combinations it is assumed that these also feature in the Council's consideration for the Preferred Option. In terms of the Options considered we believe that the 'Dispersal of Development' option should be avoided as development spread out over such a geography will make the planning and delivery of required infrastructure more complicated and potentially unviable.

In relation to the option of a New Settlement, considering the time it will take to plan and start to deliver homes it would appear that this option will need to be considered in combination with another option to ensure homes continue to be delivered across the early years of the Plan period. We would wish to ensure any new settlement is planned strategically and infrastructure led.

In relation to Question 5H we agree that Options 3, 5 & 6 are the only NPPF compliant possibilities.

Economy

With regards to employment land, the past take-up rates clearly show how strong the demand for employment land has been within the Borough in recent years. Whilst there will always be a degree of uncertainty as to future demand and this is shown through the broad range of employment land requirement estimates within the report, we believe that consideration should be given to at least safeguarding a quantum of employment land towards the upper end of the range. This would

provide flexibility to bring forward further employment land allocations within the plan period if the demand allows. This could be done, although not necessarily exclusively, through extensions to existing employment sites, providing some certainty for developers to invest in up-front infrastructure to support the continued expansion of sites if they are successful.

Transport

The County Council's transport comments recognise paragraph 109 of NPPF that states 'Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

The New Garden Settlement considered in paragraph 2.16 and the potential locations for a new Garden Community (including MUEs) listed in paragraph 5.34 would only be supported in sustainable transport terms if they are served by new high-quality public transport provision. All locations being considered are not currently adequately served by public transport and do not have easy access to a rail station. A new Garden Community at Meecebrook would require a new rail station to prevent it from becoming a car dominated settlement. It would also need to be planned and developed in a way that reduces the need for residents to travel by car for work, leisure, shopping and education by maximising trip containment

There are concerns about focusing development in settlements on the highway corridors / clusters listed in paragraph 5.59. Most do not have high frequency and reliable bus provision once the service leaves Stafford and they are not served by a rail station, therefore are not recognised as high-quality transport corridors. Services to Gnosall and Barlaston are around every 30 minutes and all other corridors have either one bus every one or two hours or no bus service at all.

An appraisal of sustainable transport accessibility is required in order to determine the preferred option in transport terms. Traffic modelling of the preferred option will be required as appropriate to identify likely highway mitigation required to accommodate residual traffic generation. The County Council will support the Borough Council with these appraisals which will provide the evidence for identifying the package of measures required to ensure acceptability in transport terms. The Integrated Transport Strategy will be updated accordingly.

An initial traffic appraisal using the existing SATURN traffic model has been completed by Atkins consultants to consider the likely impact of a further 1,500 new homes in the south, east or north of Stafford and 25 hectares of employment in either the east or north, between 2031 and 2040. It concludes that growth in the north will have the least impact on the overall performance of the highway network, mainly due to the proximity to the M6. All growth scenarios will require significant improvements in sustainable transport within the new Local Plan period to 2040.

The recognition of Local Cycling and Walking Infrastructure Plans (LCWIP) in paragraph 12.1 is supported, as advised in paragraph 104 of NPPF which states that planning policies should drawing on Local Cycling and Walking Infrastructure Plans. Staffordshire County Council's LCWIP was submitted to the Department for Transport on 19th February 2020 and builds on the Council's delivery of previous sustainable transport projects. It takes a comprehensive network approach and

targets the areas where there is the greatest demand and the largest potential for the transfer of short journeys to walking or cycling.

The eight Integrated Transport Strategies, one for each District, include current policies, strategies and proposals for Staffordshire and have now replaced the 2011 Local Transport Plan. The Local Transport Plan 2011 is outdated and there is no plan to revise the document. It is therefore recommended that reference to the Staffordshire Local Transport Plan in paragraph 12.1 is removed. Reference in the Glossary to the Local Transport Plan being a five-year strategy should be replaced with a reference to the Integrated Transport Strategy.

With reference to lorry parking Staffordshire County Council's Freight Strategy includes a specific section on this issue and should form part of the evidence base. It is available here - I can make the following comments:

- SCC receives numerous requests for additional overnight HGV parking and concerns over the lack of available facilities for drivers;
- Demand for lorry parking facilities in Staffordshire is increasing with the advent of new working directives limiting driver hours and increased long distance haulage;
- The main overnight facility in Stafford closed for construction of SWAR leaving the area with a shortage of overnight facilities;
- There is a need for shorter duration layby type facilities and longer stay overnight waiting areas for drivers – this has been reiterated by drivers;
- With a lack of secure overnight facilities theft from road freight is becoming an increasingly important issue;
- It is a significant challenge both publicly and privately to provide adequate and well-located facilities for HGVs – environment and cost factors are also involved;
- DfT National Survey of Lorry Parking found that there was a critical lack of facilities in the West Midlands region with an increase in spaces of 21% required.

The issue of HGV parking is region-wide but in specific regard to Stafford Borough the reduction in capacity in Stafford itself is an issue especially with new and proposed expansion of employment and commercial areas. HGV parking areas should be located close to main trunk roads and relevant delivery/collection locations. Many existing employment areas suffer from inappropriate, poorly equipped overnight HGV parking and would be likely to benefit from designated facilities for HGVs both for short and longer stay.

Education

Staffordshire County Council (SCC) has a statutory duty to ensure that there are sufficient school places to meet the needs of the population. The School Organisation Team (SOT) acts on behalf of the Local Authority to carry out this duty and to ensure that resources are used efficiently.

For the purpose of school place planning the Borough of Stafford is divided into two distinct areas; Stafford including the surrounding rural areas and Stone including the surrounding rural areas. The Borough also includes small areas of Blythe Bridge and Clayton, which for school place planning purposes are grouped with other schools in Blythe Bridge and Newcastle areas. Any new housing

developments proposed in these two areas will need to be considered along with new housing development proposed in Staffordshire Moorlands and Newcastle/Stoke-on-Trent emerging local plans. Each of the areas area broken down into a number of smaller planning areas which are used to plan the number of school places required. Where used these planning areas group schools based on their geographical location and by assessing pupil movement between schools and catchment areas, please see Annexe 1 for a breakdown of school place planning areas.

A two-tier education system with Primary (Reception to Year 6) and Secondary (Year 7 to Year 13) schools operates across Stafford, with a three tier education system of First (Reception to Year 4), Catholic Primary (Reception to Year 6), Middle (Year 5 to Year 8) and High (Year 9 to Year 13) schools operating across Stone.

It is noted that the Borough Council are proposing to make provision for a range of dwellings from 8,467 to 13,668 between 2020 and 2040, depending on which of the five scenarios for calculating housing need are taken forward. This range would equate to an annual requirement of around 435 to 683 dwellings. The number and location of dwellings proposed influences what additional school places would be necessary to mitigate development and whether this could be achieved through expanding existing local schools and/or the provision of new schools. There may also be situations where the scale of growth proposed in certain areas could lead to an undesirable and/or unsustainable impact on education infrastructure.

The Local Plan should help to ensure that there is sufficient education infrastructure available to mitigate the impact of proposed new homes. Where it is determined that new schools are required to mitigate the impact of the proposed new homes SCC would request that land is allocated for educational infrastructure when considering areas for development.

It is appreciated that the New Local Plan Issues and Options document sets out indicative levels of growth across the proposed settlement hierarchy and we have sought to provide commentary based on the proposed options. It should be noted that any reference to additional school places does not include the impact on additional nursery provision or additional SEND provision.

When considering school sizes these are referred to in relation to Forms of Entry (FE), which are multiples of 30 relating to class size e.g. a 2 FE primary schools would have two classes (30 pupils in each) in every year group (420 places excluding nursery). It is also possible for schools to operate at half form entry i.e. 1½ FE equals 45 pupils per year group (315 places excluding nursery). However, this creates complexity in organising the school and requires mixing classes across age groups. From an educational perspective some schools and governing bodies believe that teaching pupils from two age groups in one class (mixed aged teaching) is beneficial to the pupils. However, there are many educators who don't believe this is the most appropriate method to organise and teach pupils, as it can present challenges due to the difference in ages and abilities, which can affect learning outcomes. There continues to be a changing outlook on education provision and more academies being established through new schools, or maintained schools converting or being sponsored. It is therefore important that

views of schools and governing bodies/academy trusts be considered when proposing expansions or new schools that may require a different class organisation than currently being used or preferred. Currently we believe that any options that require a school to organise into mixed aged teaching would not be the preferred option by the majority of schools.

In general, a development or combinations of developments equating to 750+ dwellings may trigger the need for a new primary school and a development of around 5,000 dwellings for a new secondary school. A ½ FE expansion to an existing school could be required for developments of around 500 dwellings.

A new primary school would need to be at least 1 FE (210 places plus nursery provision) and require land of 11,415m² to be allocated to facilitate this. To deliver a new 1 FE primary currently costs in the region of £5.2m (as at Q3 2019). A new secondary school would need to be at least 5 FE and require land of approx. 21 acres with build costs in the region of £25m. Any costs and land values shown are indicative estimates only.

Where new schools are required the sites would need to be of regular shape, level, flat and without significant topographical features that would be considered incongruent with use as a school, free from contaminants and other adverse ground conditions, and suitable for the phase of education proposed. Other site requirements will also be required such as but not restricted to the provision of utility services onto the site, drainage and vehicular access and will be detailed and discussed when appropriate.

Where existing schools have insufficient land to expand on their current site consideration should be given to allocating additional land adjacent to the school to facilitate growth where this is possible. In addition, any new school proposed may also need to have additional land safeguarded to allow for future growth.

Where there are pressure points for school places consideration would be given for potential expansion of existing school sites and in the more rural areas consideration will be given to the implications on school transport.

Pupils residing in areas without schools would be entitled to free home to school transport where the catchment or nearest school is over two miles walking distance at primary age or three miles at secondary age. Therefore, any growth in these locations would bring additional implications in terms of transport costs and potential highway issues around school sites. This could require education contributions being sought towards additional school places, transport costs and highway improvements such as crossing points and a contribution towards school travel plans to accord with any necessary planning conditions. However, consideration needs to be given as to whether growth in such areas is sustainable as ultimately the public purse would need to pick up the costs of school transport when any developer obligation comes to an end.

The School Organisation Team's comments on the preferred options for growth are set out below and assumes that the new homes proposed exclude the 6,000 new homes already with planning permission or land identified for housebuilding within the current Plan for Stafford Borough 2011-2031. In order to determine whether a school can be expanded to mitigate housing development a feasibility study would

need to be undertaken to ensure compliance with Sport England and S.77 legislation. This takes into consideration outside play areas being of sufficient size to support any proposed growth in pupil numbers or if an expansion needs additional land to address any shortfall. Where it is determined that additional land is required this would need to be adjacent to the existing school site.

Growth Option 1 - Stafford and Stone only focussed development

The schools with potential capacity to provide mitigation for development in Stafford and Stone are those where school catchment areas provide the least likelihood of significant housing development as they tend to be in already developed urban areas. Feasibilities would need to be undertaken to determine the potential of each schools site to provide mitigation for housing development.

Proposed new development would need to be targeted to areas where local schools across all the relevant phases of education could be expanded or be of sufficient size to provide land and education contributions to support new education infrastructure.

Across schools in the North of Stafford Town there is no capacity to provide mitigation for housing development in primary schools, existing capacity is needed for expected basic need growth, with two new schools already proposed to mitigate known housing on the North of Stafford Strategic Development Location (SDL). The sites for the two new schools are not of sufficient size to allow for expansion to accommodate further housing growth. Land would need to be safeguarded on any future large development sites for the provision of new education infrastructure.

Whilst there is potential to expand some primary schools to mitigate further housing development in Stafford Town, as stated above these schools are already in built up urban areas. There is no capacity to provide mitigation at schools in the South of the Town as capacity is required for housing development that is currently being built.

In the West of the Town, there exists some potential capacity in one of the local schools, however this is intended to provide early mitigation for homes currently being delivered. There are proposals in place to deliver a new primary school in this area of the town on the West of Stafford SDL to mitigate housing developments already being delivered. The new school site is not of sufficient size to allow for expansion to accommodate further housing growth.

At secondary school phase there is currently a projected shortfall of places with a new secondary school proposed to meet the growth expected from the homes proposed in the current local plan. Any further development in Stafford will need to be mitigated by secondary school infrastructure. This may require land to be earmarked for an additional new secondary school as the site of the proposed new secondary school is not sufficient to provide more places than currently planned.

In Stone Town, there exists some potential capacity in two first schools. Feasibilities would need to be undertaken to determine the potential of each school site to provide mitigation for housing development.

Stone first schools predominately feed into one of two middle schools which feed into the single high school. However, both middle schools and the high school have recently undergone expansion programmes to accommodate growth in pupil numbers from current housing development, limiting further potential to grow.

Growth Option 2 - Stafford, Stone and Key Service Village focussed development (reflecting the approach in the current Plan for Stafford Borough)

The continuation of the current approach would put pressure on school places where there has already been significant development. Refer to comments set out in Growth Option 1 with regarding Stafford and Stone.

A proposed development allocation for each of the Key Service Villages, Rural Villages and other areas would need to be determined. This would enable further analysis to be undertaken to determine what mitigation is required for education infrastructure.

The two rural primary cluster areas in Stafford include eight Key Service Villages with some schools in these villages having already been expanded or with proposals in place for future expansion. Whilst it is already considered that some of these schools cannot be expanded/expanded further, i.e. Eccleshall, Gnosall, Weston, Great Haywood, Little Haywood/Colwich, there does remain limited potential capacity for expansion in Hixon, Haughton and Woodseaves, subject to feasibilities being undertaken.

All of the Stafford primary schools feed into one of the six secondary schools. Secondary school places are already under pressure, with a new secondary school proposed to support the housing in the current local plan.

There are three Key Service Villages in Stone and whilst it is already considered that two first schools in Tittensor and Yarnfield cannot be expanded further, there may be some potential for additional capacity at Barlaston subject to a feasibility being undertaken.

There is currently some potential capacity for a small number of homes in the areas served by the first schools in Standon and Milwich, subject to feasibilities being undertaken.

Growth Option 3 - Disperse development across the new settlement hierarchy

Stafford

Refer to comments set out in Growth Option 1 and 2. Development across the proposed settlement hierarchy would need to be targeted towards areas where there is current education infrastructure which could accommodate growth in numbers, or the developments would need to be of sufficient size to provide land and build costs for new schools.

One of the four areas named in this option is Doxey which is located in the Stafford West cluster area and also incorporates the West of Stafford SDL in the current local plan. As stated previously the local primary school has been expanded to mitigate the impact of housing developments currently being built and to provide early mitigation for the SDL site. In addition, there is a proposal to provide a new 2

FE primary school in this area of the town to mitigate local housing development on the SDL site.

The remaining three areas Baswich, Berkswich and Walton-on-the-Hill are located in Stafford South cluster of schools. All schools in Stafford South are popular and have extremely limited potential to expand. Further analysis will need to be undertaken when there is further clarity on potential housing numbers and site allocations. Any additional housing in Stafford would impact on school places across both phases of education and whilst it may be possible to accommodate or expand schools at primary level, there is already a projected shortfall in secondary school places.

Stone

Refer to comments set out in Growth Option 1 and 2 regarding Stone. A number of schools have already been expanded due to the level of housing development which has already taken place and currently being built.

North Staffordshire Urban Area

Building up to the border with Newcastle and Staffordshire Moorlands would also need to take into consideration the impact of the emerging local plans in these areas, as in these areas planning of school places forms part of the wider Newcastle and Staffordshire Moorlands school place planning areas. The 'Clayton' area within the Stafford Borough border is located within a Newcastle planning cluster and served by a rural primary school which is already being expanded to mitigate local housing. The secondary school which serves this area is already under significant pressure on places. Further clarity over the number of homes in this area would need to be confirmed to determine the impact on school places and whether either school could mitigate further housing development. Any housing proposed in this area would require the provision of school transport to both phases of education.

The area of Meir Heath/Rough Close within the Stafford Borough border is located within a Staffordshire Moorlands planning cluster the local school has no potential to expand. The area of Blythe Bridge within the Stafford Borough border is located within a Staffordshire Moorlands cluster area and is served by two primary schools. There is currently housing development in one of the catchments with proposals for its mitigation, the number of homes proposed in this area would need to be clarified in order to determine whether it could be mitigated at this school. A development of sufficient size to warrant a new primary school could be considered, however the impact on secondary school places would need to be determined, as the secondary school place provision for this area is provided in Blythe Bridge and not the Stafford secondary schools.

The impact on capacity across all phases of education would need to be determined once there is more clarity on the numbers and locations of additional homes. It is considered that any development in these areas would also impact on school places in the Stoke-on-Trent local authority area. The impact on school places across these borders would need to be assessed given the status of the relevant local plans.

Large Settlements

Eccleshall; Gnosall; Great Haywood; Hixon; Little Haywood and Colwich

The five large settlements named are all Key Service Villages within the current local plan. Please refer to comments set out in the response for Growth Option 2.

Medium Settlements *Brocton A34; Church Eaton; Derrington; Great Bridgeford; Haughton; Hilderstone; Hyde Lea; Weston; Woodseaves*

Three of the Medium Settlements (Haughton, Weston, Woodseaves) are Key Service Villages within the current local plan. Please refer to comments set out in the response for Growth Option 2.

In the areas of Church Eaton and Hyde Lea there is some potential to support limited housing growth in the schools that serve these communities. The schools that serve the remaining medium settlements cannot be expanded/expanded further. As previously stated, all of the Stafford primary schools feed into one of the six secondary schools. Secondary school places are already under pressure, with a new secondary school proposed to support the housing in the current local plan. Further detail about the proposed location and number of homes to be built would need to be confirmed in order to determine whether there would be sufficient capacity to mitigate further development or whether land for new education infrastructure is needed.

The medium settlement, Hilderstone is served at first school level by Green Lea first school which has limited potential for growth, please refer to Growth Option 1.

Small Settlements *Adbaston; Aston-by-Stone; Bradley; Cold Meece; Cotes Heath; Creswell; Croxton; Hopton; Milwich; Moreton; Norbury; Norton Bridge; Ranton; Sandon; Salt; Seighford.*

The small settlements fall within different school place planning areas as indicated: Creswell (Stafford North); Seighford (Safford West); Adbaston, Bradley, Croxton, Moreton, Norbury, Norton Bridge, Ranton (Stafford Rural 1); Hopton, Sandon, Salt (Stafford Rural 2); Aston-by-Stone, Cold Meece (Stone Town); Cotes Heath (All Saint's CE First); Milwich (Green Lea First)

Please refer to Growth Options 1 and 2 for the impact on schools for these small settlements.

The number of homes proposed in small settlements would need to be confirmed in order to determine the overall impact school places.

Growth Option 4 Focus all new development at one or more new garden communities only

There are no existing schools which could be expanded to accommodate the level of growth proposed for these communities. Such communities would need to be of sufficient size to support the provision of land and build costs for new education infrastructure.

- i. Land north and east of Gnosall. This area of land could accommodate up to 3,500 new homes and supporting employment. (Estimated homes 2,750 – 3,500)

The level of development proposed for this area could not be supported by existing schools. As stated previously a minimum of 5,000 homes in an area is required to enable viable provision of a new secondary school. This level of housing would require a 3 to 4 FE secondary school which is deemed to be too small to be viable. All secondary school places in Stafford are already under pressure with a new secondary school proposed. The estimated homes in this option would not be sufficient for a new secondary school and existing secondary schools would not be able to mitigate the impact. From an education perspective this is not an appropriate option as there is no mitigation for education infrastructure.

- ii. Land between Gnosall and Haughton north of the A518 between Stafford and Newport. This area of land could accommodate up to 3,250 new homes and supporting employment. (Estimated homes 2,500 – 3,250)

The level of development proposed for this area could not be supported by existing schools. As stated previously a minimum of 5,000 homes in an area is required to enable viable provision of a new secondary school. This level of housing would require a 2½ to 3½ FE secondary school which is deemed to be too small to be viable. All secondary school places in Stafford are already under pressure with a new secondary school proposed. The estimated homes in this option would not be sufficient for a new secondary school and existing secondary schools would not be able to mitigate the impact. From an education perspective this is not an appropriate option as there is no mitigation for education infrastructure.

Given the proximity of options i & ii, Land north and east of Gnosall and Land between Gnosall and Haughton north of the A518 between Stafford and Newport, if they were considered in combination then this could yield a total of between 5,250 – 6,750 homes. The level of development collectively across i & ii could not be supported by existing schools. There would be a requirement of between 5 and 7 FE of new primary school provision and new secondary school provision. However, the range of new homes, once totalled, at its lowest level would exceed the minimum number of dwellings deemed viable for a new secondary school and could offer a potential infrastructure solution. To support the need of a new secondary school the higher end of the range of total dwellings would be more appropriate. Land for new schools would need to be master planned into the development with developers also required to fund build costs of the schools. The number and size of schools would need to be considered further should this option proceed further.

- iii. Seighford, a largely agricultural site with an airfield and established employment land either side of the B5405 to the west of Stafford town. This area of land could accommodate up to 5,250 new homes and supporting employment. (Estimated homes 4,000 – 5,250)

The level of development proposed for this area could not be supported by existing schools. As stated previously a minimum of 5,000 homes in an area is required to enable viable provision of a new secondary school. This level of housing would require a 4 to 5 FE secondary school which is deemed to be too small to be viable,

unless homes were delivered at the highest range of the estimate. A 5 FE new secondary school could be the potential mitigation and land would need to be provided from within the development. If the number of homes delivered was at the higher range and deemed the appropriate solution for secondary school places (as this is still at the minimum level for viability), 5 FE of primary provision would also be required.

- iv. Land to the north of Redhill Business Park and to the west of the A34 near to M6 Jn14 Stafford North. A large tract of land that could accommodate up to 5,000 new homes and supporting employment. (Estimated homes 3,500 – 5,000)

The level of development proposed for this area could not be supported by existing schools. As stated previously a minimum of 5,000 homes in an area is required to enable viable provision of a new secondary school. This level of housing would require a 3½ to 5 FE secondary school which is deemed to be too small to be viable, unless homes were delivered at the highest range of the estimate. A 5 FE new secondary school could be the potential mitigation and land would need to be provided from within the development. If the number of homes delivered was at the higher range and deemed the appropriate solution for secondary (as this is still at the minimum level for viability), 5 FE of primary provision would also be required.

- v. Meecebrook, focussed around Cold Meece south of Swynnerton. This has the potential for up to 11,500 new homes and supporting employment land. (Estimated homes 9,000 – 11,500)

The level of development proposed for this area could not be supported by existing schools. Whilst this area currently sits within a 3-tier education system, it has been determined that any new schools to be built as part of a self-sustaining New Settlement/Garden Town community would follow a 2-tier education system.

There would be a requirement for the provision of 9 to 12 FE of new primary school provision and of 9 to 12 FE of new secondary school provision. Land for new schools would need to be master planned into the development with the developers also required to fund the build costs of the school(s). The number and size of schools would need to be considered further should this option proceed further.

- vi. Hixon. An ex-WW2 airfield located to the east of the Borough. Much of the site is currently unused and is partly developed as an industrial park. The site on the edge of Hixon could be expanded to accommodate up to 2,750 new dwellings and supporting employment land. (Estimated homes 2,250 – 2,750)

The level of development proposed for this area could not be supported by existing schools. As stated previously a minimum of 5,000 homes in an area is required to enable viable provision of a new secondary school. This level of housing would require a 2½ to 3 FE secondary school which is deemed to be too small to be viable. All secondary school places in Stafford are already under pressure with a new secondary school proposed. The estimated homes in this option would not be sufficient for a new secondary school and existing secondary schools would not be

able to mitigate the impact. From an education perspective this is not an appropriate option as there is no mitigation for education infrastructure.

- vii. Land East of Weston. There are a number of environmental constraints in this area but there is potential to bring forward up to 2,000 new homes and supporting employment land. (Estimated homes 1,750 – 2,000)

The level of development proposed for this area could not be supported by existing schools. As stated previously a minimum of 5,000 homes in an area is required to enable viable provision of a new secondary school. This level of housing would require a 2 FE secondary school which is deemed to be too small to be viable. All secondary school places in Stafford are already under pressure with a new secondary school proposed. The estimated homes in this option would not be sufficient for a new secondary school and existing secondary schools would not be able to mitigate the impact. From an education perspective this is not an appropriate option as there is no mitigation for education infrastructure.

Growth Option 5 - Disperse development across the new settlement hierarchy and also at one or more new garden communities / major urban extensions

The level of education infrastructure needed under this option will depend upon which of the garden communities/major urban extensions are proposed and the number and location of homes proposed across the new settlement hierarchy. The implications for each of these options has been set out under Options 1 – 4. Land for new school sites along with education contributions and/or the expected cost of school expansions would need to be provided/met from the development(s), along with any associated transport costs.

Growth Option 6 - Allocate development to settlements linked by existing transport corridors. This option also potentially employs one or more garden communities / major urban extensions.

The level of education infrastructure needed under this option will depend upon which of the garden communities/major urban extensions and the location of the settlements along the transport corridors are proposed. The implications for each of these options has been set out under Option 1- 4. Land for new school sites along with education contributions and/or the expected cost of school expansions would need to be provided/met from the development(s), along with any associated transport costs.

Landscape

In relation to Question 9A Green and Blue Infrastructure (GBI)

- a) Yes
- b) Yes

Continuing on GBI we consider that the emphasis of all the various sections in the Issues and Options document should be considered in the light of the overarching issue of sustainability and climate change.

The Spatial Portrait could be better developed and with a much stronger emphasis on the natural environment. The strategic map of the Borough in its context should include canal corridors, river corridors and key elements of the Natural Assets plan. We would encourage the Borough Council to take a more holistic approach to the Climate Change impacts by creating a new Green and Blue Infrastructure Plan at the heart of the Local Plan.

All the other threads and sections of the plan with their policies should relate to the GBI plan - as without a healthy and resilient environment the other aspects of the plan will not be achievable. Conversely, each Section of the Plan will be greatly enhanced by having GBI at its core as the following diagram attempts to explain:



Delivering Quality Development acknowledges the importance and explains in outline the GBI concept. The Natural Assets plan could form the centre of a GBI strategy- augmented by taking into account the HS2, Canals, Motorways, main roads, cycle networks, open spaces and all the GBI assets of the Borough. At the Heart of the Delivering Quality Development policies should be a commitment to the 'Building for Life' approach which is currently being updated to include Active travel and healthy living criteria.

Environmental Quality sets out the key issues in maintaining a healthy environment- once again the GBI Plan would incorporate measures to mitigate the impacts of people by positive GBI planning.

The Visitor Economy is not singled out as a Section in the Issues plan, although there are numerous references and it relates well to future town centre planning. A well planned GBI plan in Towns and in the rural areas would be a major benefit in

attracting visitors to the Borough through an enhance landscape and natural environment. Victoria Park in Stafford is a good example where the restoration of the park and riverside will fit into a wider riverside strategy for the Town. Town Centre Planning for future needs should include the natural and designed landscapes of Towns and villages- as discussed in the above section.

Economic Prosperity and Development Strategy; this is obviously at the heart of the local plan- and the potential Garden Communities or urban extensions should be fully integrated into a Borough wide GBI plan from the inception in order to mitigate adverse environmental impacts and to take opportunities for active travel and healthy living. We would encourage the Borough to also take into account initiatives for nearby Districts to consider New Settlements- for example South Staffs along the A34 corridor within easy reach of Stafford.

Connections - this is an ideal way to integrate the GBI plan throughout the Borough- with the emphasis on Active Travel and healthy living, as well as taking advantage of the ready- made canal river and natural environment corridors. Health and wellbeing once again relates well to a GBI plan by integrating open space planning and linking to existing and new corridors connecting places and communities.

Flood events and extreme weather patterns: recent flooding and storm events have brought into focus the need to plan positively for the river catchments in the Trent, Sow and Penk.

Food and Farming - a section on future agricultural land use and impacts on farming should be integrated into the GBI plan.

Question 9G 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?

Adequate consideration of visual impact is now considered best practice for the majority of large-scale developments. However small developments can also have a severe visual impact. Any policy should encourage / enable the planning officers for individual cases to consider whether there is a need for Landscape and Visual Impact Assessment, and Landscape / Visual mitigation. Guidance could be provided with examples.

Question9H Do you consider there are areas in the Borough that should have the designation of Special Landscape Area?

This is now considered a somewhat dated approach. As outlined in Q9G, each case should be considered on its own merits. If the GBI plan is used as a way forward it should be clear that each development needs to fit into the wider environmental context.

Ecology

Question 9B How should plan policies be developed to seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider nature recovery network?

Again, these could fit into a GBI plan, using the Nature Recovery Network to determine which habitats are most appropriate. This is also likely to be driven by

mandatory biodiversity net gain; Stafford Borough could go further as in Lichfield and set a higher percentage net gain to ensure higher quality of natural setting for development.

Question9C *Should the new Local Plan:*

a) Continue to protect all designated sites from development, including maintaining a buffer zone where appropriate;

Yes, these are the building blocks for restoring biodiversity in the wider environment; they contain the best examples of remaining habitats and the greatest numbers of species which would colonise restored areas.

b) Encourage the biodiversity enhancement of sites through development, for example, allocating sites which can deliver biodiversity enhancement;

Yes,

c) Require, through policy, increased long term monitoring of biodiversity mitigation and enhancement measures on development sites

Yes, improved monitoring is key to understanding what works in terms of mitigation within development. It will be necessary to ensure that remediation is also built into schemes so that where monitoring indicates problems these can be put right.

Question10B *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?*

This is a difficult issue. National schemes such as those developed in Holland may be more effective than local attempts. Specialist advice on the latest case law would be advised. If Stafford Borough does decide to adopt such a policy, then it will need to consider ammonia deposition as well as NO_x. This is because techniques to remove NO_x from vehicles and industrial processes are becoming widely used, but these generally emit NH₃, which is at least as damaging to habitats as NO_x.

Tree protection

Question 9E *Do you consider that the described approach will achieve the Council's ambition of maintaining and increasing tree cover within the Borough?*

Yes; this should not be at the expense of existing habitats such as meadows and wetlands.

Are there any further measures which you think should be adopted to further enhance these efforts?

Use of fruit trees could help with Productive Landscapes. Better community adoption of spaces such as seen at Derrington.

Archaeology / Historic Environment

Archaeology / Historic Environment

Q1.A Is the evidence that is being gathered a suitable and complete list? & Q1.B Have any key pieces of evidence necessary for Stafford Borough's new Local Plan been omitted? As noted in our response to the 'Scoping the Issues' document, the new local plan, in respect to the Historic Environment (including designated and undesignated below-ground archaeology and landscapes), and as required by the

NPPF, should be based on adequate, up-to-date and relevant evidence. As such, it was advised that a degree of review and updating is required to the Stafford Borough Council Historic Environment Assessment (SBHEA), which includes Eccleshall, Gnosall, Stafford Environs, Stone, and the Haywoods (search for Historic Environment Assessments on the Staffordshire County Council website for more). These were produced over a decade ago and there is likely to be significant new evidence to consider resulting from initiatives such as the National Mapping Programme, the Chase Through Time Project, and work carried out in advance of HS2. Such a review will ensure that the SBHEA continues to be relevant to the aims of the Borough Council in protecting and enhancing all types of heritage asset.

2.18 This is a very limited 'portrait' of Stafford Borough's historic environment. Reference is made to designated Registered Parks and Gardens and Conservation Areas; however, there is no mention of other designated heritage assets such as listed buildings, Scheduled Monuments, nor the Registered Battlefield at Hopton Heath. No mention is made of undesignated heritage assets at all.

Q 3.A Do you agree that the Vision should change? The current vision shows an appreciation of the importance of the historic environment and we would be keen to see this retained in the new vision.

3.9 It is welcomed that the key objectives for Stafford and Stone, and the areas outside of these settlements, include the conservation and enhancement of historic character, heritage assets, conservation areas, and historic buildings. We would be keen to see these retained should the objectives be revised in this or another form.

4 It is worth highlighting here Historic England Guidance relating to energy efficiency and adaptation in relation to the historic environment/historic buildings <https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>.

4.4 Good quality sustainable development should also benefit the historic environment/historic character.

5.91 The table does not make mention of the 'Planning for landscape change' supplementary planning guidance, which may be helpful in defining an appropriate extent for settlement boundaries (search for Planning for landscape change on the Staffordshire County Council website for more).

5.9.1 If Conservation Areas and Listed Buildings are included in this table, why not also include Scheduled Monuments (and possibly Registered Parks and Gardens/ Battlefields- although, on the whole, these are likely to be outside settlement boundaries)?

Q5.Q Do you agree with the methodology used to define settlement boundaries? If not please provide reasons for your response. See responses to 5.9.1 above.

Q6.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? It is worth highlighting here the Historic Farmsteads Guidance produced by Staffordshire County Council in

conjunction with Historic England (search for Historic Farmsteads Guidance on the Staffordshire County Council website for more). If consideration is being given to the expansion of rural business premises this could include the development and adaptation of historic farmsteads. The aforementioned guidance may assist in identifying where this might be appropriate or not.

9.36 Historic farmsteads and known and unknown below ground archaeology should be included here.

9.37 The appreciation of the contribution that the historic environment makes to the physical character of the Borough, and indeed the key role it plays in the local economy is welcomed.

9.37 Historic farmsteads could be mentioned specifically here, in particular in relation to the conversion of historic buildings.

In relation to Q9.I in general, these are all supported, and we agree that the new local plan should provide for the 5 items listed. With regard to point 1, Suggest changing the word broad to 'wider', and that reference should be made to considering/encompassing both designated and undesignated heritage assets in their landscape/natural environment context. For point 5 it is worth highlighting here Historic England's guidance/research on climate change adaption, particularly for historic buildings (see <https://historicengland.org.uk/research/current/threats/heritage-climate-change-environment/> and <https://historicengland.org.uk/whats-new/statements/climate-change/> for more).

We would also strongly recommend that consideration is given to how below ground archaeological remains are dealt with. This could take the form of a simple reference back to the NPPF. Archaeology, regardless of designation, is a material consideration within the planning system in England. The impact of any proposed development upon archaeology should be considered as part of the decision a planning authority makes about whether to grant planning permission for a particular development. The framework for this is set out in the NPPF (Chapter 16- Conserving and enhancing the historic environment).

9.40 The recognition provided here regarding the role that the conservation of the historic environment plays in terms of creating positive places for people to live, work and enjoy is welcomed.

Policy N9 (pg 155) This policy relates to designated heritage only. Are there any other indicators which could be used to measure impacts/successes in relation to undesignated heritage?

Policy N9 (pg 155) – English Heritage should now read Historic England.

Public Rights of Way

There is very limited information within the plan regarding the public rights of way network, which is understandable at this stage, but we welcome the desire to improve accessibility on the walking and cycling networks throughout the Borough.

The desire to increase the levels of physical activity is also welcomed and the public rights of way network should be integral to any schemes that are developed to promote this. The Rights of Way team would be happy to provide advice and work together on any schemes which benefit residents through improvements to the path network.

As the Plan progresses and sites are allocated the Borough Council should also consider inclusion within policies for improvements to the existing path network where applicable and possible in line with Staffordshire County Council's Rights of Way Improvement Plan. This could include:

- the creation of public bridleways or the upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists.
- the creation and promotion of short circular walks to promote the health benefits of walking
- the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture

The County Council is able to provide further advice and guidance as and when required.

Specialist Accommodation

At 8.21 The growth in population figures also suggest an increased need for models of adaptable and appropriate accommodation for older people which supports independent living as well as specialist needs.

Paragraphs 8.21 and 8.22 reference the need for the Borough Council to employ measures to increase the supply of care facilities, however we recommend that the Council also give consideration through its local planning and planning application processes to the need for and role of accommodation which prevents or delays the need for specialist care facilities such as age exclusive or retirement housing. Increasing the range of suitable housing available gives more choice and may offer accessible alternatives to specific housing types such as bungalow housing which could be 'lost' in an open housing market. More flexibility might be required in the housing options for older people in order to give them choice and ongoing access to appropriate housing. This would align with the Planning Practice Guidance around the importance of a better choice of housing which suits the changing needs of older people and helps them to live independently for longer.

At 8.22 it would be helpful to add a reference and hyperlinks to the EDHNA document so that this can be easily cross-referenced for the source data. We noted that the time period for the additional care home, extra care and sheltered housing units is in the EDHNA but not the issues and options document and the Borough may wish to clarify this.

The Plan calculates a need for 466 nursing units and 525 residential units, compared with our own calculations of 80 additional nursing units and 410 residential units by 2039. We have used Personal Social Services Research Unit (PSSRU) and Census data which we feel is more reliable as it takes into account

other health and life limiting conditions rather than being based on the population growth and the proportion of the current population in care facilities. Full details of this information can be found in our [care home market position statement evidence base](#).

We acknowledge that calculating the need for nursing care in Stafford is difficult; best practice modelling shows a small deficit in Stafford at present although current usage here is high however at this point, we can't say whether this will be sustained. Overestimating the shortfall for nursing care risks an oversupply in the area.

Question 8.I. The location and accessibility of any specialist housing should be a consideration for all schemes whatever its type to ensure that people have access to services and to public transport in order to avoid social isolation and promote independence and community interaction.

Minerals and Waste

In relation to paragraph 1.17 it is important to remember that, along with the Plan for Stafford Borough 2011-2031 (adopted in June 2014), the Plan for Stafford Borough Part 2 (adopted in January 2017), and Neighbourhood Plans, the [Staffordshire and Stoke-on-Trent Waste Local Plan \(2010 to 2026\)](#) and the [Minerals Local Plan for Staffordshire \(2015-2030\)](#) also form part of the Development Plan for Stafford Borough

If the decision is taken to include a new "Garden Community" in the development strategy, it will be important to ensure that the proposed development does not compromise significant mineral resources or waste management facilities, so these need to be taken into account when assessing site options.

We have already pointed out that the hazardous waste landfill at Meece falls within the area of the Meecebrook option. This is not a large facility, but it is the only such site in the county and is of regional significance. It is specifically safeguarded by Policy 2.4 of the [Waste Local Plan](#) and permitted to operate until 2035, but its lifetime would be expected to be extended if capacity remains at that time. Should the Meecebrook proposal go ahead, it will be essential that the development is planned to avoid the risk of any constraint on the operation of the waste management facility.

All the site options appear to overlap with mineral safeguarding areas to a greater or lesser extent. The significance of this will need to be properly assessed in the light of Policy 3 of the [Minerals Local Plan](#).

With regards to Question 6D: *In allocating employment land should the Council consider a zoning approach in order to encourage higher value-added activities?* Any consideration of a zoning approach will need to ensure that it does not conflict with the aims of Policy 2.3 of the [Waste Local Plan](#) which directs the development of new waste management facilities to general industrial land (including urban and rural general industrial estates (alongside B2 and B8 uses)). It therefore relies on the continued provision of adequate supplies of B2/B8 land in the locations where new waste management facilities are required.

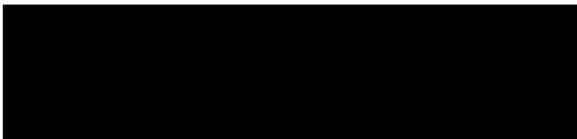
At Paragraph 10.11 while the reference to the Staffordshire and Stoke-on-Trent Joint Municipal Waste Management Strategy is relevant, it is important to remember that it deals only with Municipal Waste which accounts for less than 15% of waste arisings. It is the role of the [Staffordshire and Stoke-on-Trent Waste Local Plan \(2010 to 2026\)](#) to address the provision of waste management facilities for all of the waste produced in the area, and to manage the change in the type of facilities that are required to increase the proportion of waste that is re-used, recycled or recovered.

In relation to Paragraph 10.13 it is worth noting that the proportion of municipal waste going to landfill has fallen rapidly over the last ten years, and has stood at less than 2% since 2014/15 (See our [Annual Monitoring Report](#) for details). It might be appropriate to update the discussion to better reflect the current situation. It is unrealistic to suggest that additional land might be sought to increase landfill capacity, but it is still important to continue to act to move as much waste as possible further up the treatment hierarchy (as set out in the national waste strategy).

At 10.15 it might be helpful to rephrase this paragraph in terms of moving waste treatment up the hierarchy rather than treatment being sustainable or otherwise.

At Question 10C please note the [Waste Local Plan](#), which forms part of the Development Plan, already requires all major non waste-related development to, amongst other things, make provision to facilitate separated waste collection systems, and be supported by a site waste management plan. Any proposed new policies should explicitly build on what is set out in that Policy 1.2 of the [Waste Local Plan](#)

Yours sincerely



James Chadwick
Planning Policy Officer

Enc.

Annex 1 - Breakdown of school place planning areas

Annex 1 - Breakdown of school place planning areas

Cluster	School
All Saint's CE (VC) First	All Saint's CE (VC) First
Green Lea First	Green Lea First
Stafford North	Veritas Academy
	John Wheeldon Primary Academy
	Tillington Manor Primary School
	Parkside Primary School, Stafford
	St John's CE (C) Primary School
	St Patrick's Catholic Primary School
Stafford Town	Rowley Park Academy
	Silkmore Primary Academy
	St Leonard's Primary School
	Burton Manor Primary School
	Castlechurch Primary School
	Flash Ley Primary School
	St Paul's CE (VC) Primary School
	St Austin's Catholic (VA) Primary School
Blessed Mother Teresa of Calcutta Catholic Primary School	
Stafford South	Oakridge Primary School
	Barnfields Primary School
	Berkswich CE (VC) Primary School
	All Saints CE (VA) Primary School
	St Anne's Catholic Primary School
	Leasowes Primary School
Stafford West	Cooper Perry Primary School
	Doxey Primary and Nursery School
Stafford Rural 1	Bishop Lonsdale CofE Primary Academy
	Woodseaves CE Primary Academy
	Haughton St. Giles CE(C) Primary Academy
	All Saints CE (VC) Primary School, Ranton
	Gnosall St. Lawrence CofE Primary Academy
	Church Eaton End (VA) Primary School
Stafford Rural 2	Colwich CofE (C) Primary School
	St Andrew's CofE (C) Primary School
	St Peter's CE (C) Primary School
	St John's Catholic Primary School
	Anson CE (VA) Primary School
Stafford Secondary	Walton High School
	Sir Graham Balfour High School
	King Edward VI High School - A Language College
	The Weston Road Academy
	Blessed William Howard Catholic School
	Stafford Manor High School
Stone Rural 1	Barlaston CE (VC) First School
	Tittensor CE (VC) First School
Stone Town	Manor Hill First School
	Springfields First School
	Pirehill First School
	St Michael's CE (VC) First School
	Oulton CE (VC) First School
	Christ Church CE (VC) First School
	St Dominic's Catholic Primary School
Stone Middle	Walton Priory Middle School
	Christ Church Academy
Stone High	Alleyne's Academy
Blythe Bridge	Fulford Primary
	Meir Heath Primary
	Springcroft Primary
Newcastle 3	Baldwins Gate CE (VC) Primary

Annexe 1

GBBCHMA Net Migration to Stafford - as of March 2019

	2002	2003	2004	2005	2006
Birmingham	-20	-30	-50	-50	-10
Bromsgrove	10	0	0	-10	10
Cannock Chase	-150	-110	-210	-110	-140
Dudley	-20	-20	-20	-20	-20
Lichfield	-60	-30	-80	-80	-40
North Warwickshire	-30	0	0	-20	0
Redditch	0	0	0	-10	0
Sandwell	-30	-20	-30	-30	-20
Solihull	10	-10	-20	-10	0
South Staffordshire	-130	-130	-140	-150	-180
Stratford-on-Avon	10	-10	0	10	20
Tamworth	0	-20	-20	-20	-10
Walsall	-50	-70	-40	-60	-70
Wolverhampton	-50	-90	-40	-60	-30
Total	-510	-540	-650	-620	-490

Black Country Authorities

	2002	2003	2004	2005	2006
Dudley	-20	-20	-20	-20	-20
Sandwell	-30	-20	-30	-30	-20
Wolverhampton	-50	-90	-40	-60	-30
Walsall	-50	-70	-40	-60	-70
Total	-150	-200	-130	-170	-140

Stoke-on-Trent /Newcastle-under-Lyme

	2002	2003	2004	2005	2006
Stoke on Trent	-200	-90	0	10	-110
Newcastle under Lyme	10	-30	0	-40	-40
Total	-190	-120	0	-30	-150

Source:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/migration>

2007	2008	2009	2010	2011	2012	2013	2014	2015
-30	-20	40	-40	-20	40	-60	0	-10
0	0	0	10	-10	0	0	0	0
-110	-10	-50	-100	-40	-90	-80	-60	-140
-10	-20	-10	-20	-20	-20	-30	-30	-10
-50	-10	-10	-10	-20	-20	-10	-10	0
10	10	-10	-20	10	0	10	-10	0
0	10	0	-10	10	0	0	-10	0
-40	-20	-30	-10	-30	-30	0	-10	-20
-10	0	20	-10	0	0	10	0	10
-70	-130	-80	-10	-50	-130	-20	-30	-130
0	-10	-10	-10	-20	10	0	0	0
-20	10	-20	-20	10	-20	-10	-20	-10
-70	-60	-50	-50	-20	-10	-40	-50	-30
-30	-40	-40	0	-20	-50	-30	-20	-20

-430	-290	-250	-300	-220	-320	-260	-250	-360
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2007	2008	2009	2010	2011	2012	2013	2014	2015
-10	-20	-10	-20	-20	-20	-30	-30	-10
-40	-20	-30	-10	-30	-30	0	-10	-20
-30	-40	-40	0	-20	-50	-30	-20	-20
-70	-60	-50	-50	-20	-10	-40	-50	-30
-150	-140	-130	-80	-90	-110	-100	-110	-80

2007	2008	2009	2010	2011	2012	2013	2014	2015
-220	-160	-120	-140	-50	-150	-80	-60	-70
-30	-10	10	-40	-20	-30	-30	30	-50
-250	-170	-110	-180	-70	-180	-110	-30	-120

withintheuk/datasets/matricesofinternalmigrationmovesbetweenlocalauthoritiesandregionsincludingth

2016	2017	2018	Total Net Migration
-40	-90	-106	-496
0	20	-11	19
-170	-230	-235	-2035
0	0	-12	-282
0	-70	-95	-595
-10	-10	6	-64
10	-10	-1	-11
0	-40	-24	-384
10	-10	-2	-12
-90	-140	-121	-1731
10	0	1	1
-10	-10	-4	-194
-60	-120	-117	-967
-50	-80	-130	-780
-400	-790	-851	-7531

2016	2017	2018	Total Net Migration
0	0	-12	-282
0	-40	-24	-384
-50	-80	-130	-780
-60	-120	-117	-967
-110	-240	-283	-2413

2016	2017	2018	Total Net Migration
-220	-100	-262	-2022
0	-20	-123	-413
-220	-120	-385	-2435

[ecountriesofwalescotlandandnorthernireland](#)

Our ref:
VIP/MJ

Service:
Planning

Direct Line:

Date:
21 April 2020

30

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

Dear Forward Planning Team,

Stafford Borough Council New Local Plan 2020-2040 – Issues and Options consultation

This letter contains the officer response on behalf of the Association of Black Country Authorities (ABCA) to the Issues and Options Consultation. Responses to specific consultation questions are set out in the Appendix One to this letter.

In summary, we strongly support those growth options which provide the opportunity to meet housing and employment land needs arising in the Black Country. We also support the potential for land at Meecebrook to be allocated in the next stage of the new Local Plan. We consider it presents a unique and once in a generation opportunity to drive forward the realisation of Stafford's economic growth ambitions and at the same time form part of the strategic solution to meeting the housing and employment land needs arising in the Black Country. Our detailed reasoning and justification for this position is set out below.

Background

The Black Country Authorities are in the process of reviewing the Black Country Plan 2018-2038 (formerly known as the Black Country Core Strategy) with the intention of publishing a Draft Plan (Regulation 18) for consultation in autumn 2020.

As part of our Duty to Co-operate requirements, the Black Country Authorities have worked with partners over the past 3 years to update them on the plan making

process and the key issues affecting the Black Country, particularly regarding the position with our ability to meet our future housing and employment land needs to 2038.

We published our most recent evidence base in December 2019 and January 2020¹ and held a Duty to Co-operate meeting on 14th January 2020, where we provided an update on our plan-making programme, and summarised the key findings and issues arising from our evidence base.

The Black Country has provided detailed evidence in the form of an Urban Capacity Review Update 2019². This study has demonstrated that the Black Country's housing need between 2019 – 2038 is 71,500 homes, of which 44,500 homes can be accommodated in the urban area leaving a shortfall of 27,000.

Turning to our employment land, the Black Country economy has been performing well and is considered strong. Our future employment land requirement ranges between 592ha (baseline growth) to 870ha (aspirational growth based on West Midlands Combined Authority SEP). Our existing supply (including completions) provides approximately 305ha of land leaving a shortfall of between 263ha – 500ha depending on the two growth scenarios set out above.

From this evidence, it is clear that the Black Country cannot accommodate all of its needs in the urban area. We have undertaken discussions with our neighbouring local authorities, as part of our Duty to Co-operate requirements, to determine their ability to accommodate some of the Black Country's unmet need. A number of local authorities including South Staffordshire, Lichfield and Cannock have indicated that they will seek to test their ability to accommodate additional housing needs over and above their own local needs as part of their local plan review process. Other local authorities have committed to undertake a local plan review, if it is clear that the Black Country cannot accommodate its own needs.

At this stage, we anticipate that these contributions could accommodate in the region of up to 9,000 to 11,000 homes and up to 170ha of employment land. Please see a more detailed breakdown in the table below.

Local Authority	Potential housing contribution to Black Country based on Local Plan Review (homes)	Potential employment contribution to Black Country (ha)
S. Staffs.	Up to 4,000	Up to around 170-320
Lichfield	Up to 4,500	0
Cannock	Up to 500-2,500	0
Total	Up to 9,000-11,000	Up to 170-320

¹ <https://blackcountryplan.dudley.gov.uk/t2/p4/>

² <https://blackcountryplan.dudley.gov.uk/media/13807/bc-urban-capacity-review-update-final-december-2019.pdf>

In the best case scenario, this would leave the Black Country with a significant shortfall of approximately 16,000 – 18,000 houses and 110 – 330ha of employment land.

We have undertaken a Green Belt and Landscape Sensitivity Assessment, which has shown that the Black Country Green Belt makes a principal contribution towards Green Belt purposes and its capacity to undertake large-scale development is limited.

Whilst we have still to finalise our site assessment, viability and delivery work, we envisage that market deliverability will also limit the capacity of the Black Country Green Belt up to 2038. This assumption is based on the case of the Birmingham Plan, where the Peter Brett Associates (PBA) Delivery Study³ concluded that market deliverability placed significant constraints on the amount of housing which could be delivered in the Birmingham Green Belt up to 2031. These constraints reduced the actual capacity of the urban extension identified in the Plan consultation from 10,000 to 5,000 homes, over the 15 year period of the Plan⁴. This assumption was based on a strong housing market recovery scenario in one of the strongest housing markets areas in the West Midlands.

As the majority of the Black Country Green Belt is located primarily in Walsall and, to a lesser extent, in Dudley, these are the two main housing market areas for potential delivery of housing in the Green Belt, with only small amounts of housing potential in Wolverhampton and Sandwell. Therefore, based on a **scenario** that there was sufficient unconstrained capacity identified in the Black Country Green Belt, a Delivery Study based on similar principles to that completed for Birmingham, may reasonably conclude that the housing market areas in Dudley and Walsall could only be expected to deliver up to a maximum of 5,000 homes in each of the two boroughs (providing a maximum total of 10,000 homes) over the 15-year Plan period, leaving a significant shortfall to be met in neighbouring authorities.

Please note that at this stage the statement does not reflect the findings of any of our key studies or our Green Belt assessment. We will be able to provide a clearer idea of the Black Country's position once we have finalised our evidence base. This will be set out in our Draft Plan, due to be published in autumn 2020.

The Issues and Options consultation

We welcome Stafford Borough Council's intention to work with local authorities, via the Duty to Co-operate, to determine the housing requirements of adjoining HMAs/FEMAs.

We note from the Council's Economic and Housing Development Needs Assessment (EHDNA) 2019, that Stafford shares a strong housing market relationship with Stoke-on-Trent and Newcastle-under-Lyme. It is our view that the analysis in the EHDNA document is too heavily reliant on narrow 2011 Census data

³ https://www.birmingham.gov.uk/downloads/file/1750/pg3_housing_delivery_on_green_belt_options_2013pdf

⁴

https://www.birmingham.gov.uk/downloads/file/1211/strategic_housing_market_assessment_2013_housing_targets_2011_to_2031_technical_paper

rather than considering more up to date annual migration flows. Using net migration data between 2002 – 2018⁵ (see Appendix Two), our analysis suggests that the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) experienced significant net migration flows to Stafford Borough of a comparable scale to Stoke-on-Trent and Newcastle- under- Lyme. Between 2002 to 2018 there were a total of 7,531 net migration losses of residents to Stafford, of which 2,413 net losses were from the Black Country. This is in comparison to a total of 2,022 net losses from Stoke-on-Trent and 413 from Newcastle- under- Lyme.

We also note that the EHDNA suggests that whilst Stafford Borough is self-contained, there is some overlap with the Wolverhampton Travel to Work Area (TTWA). The 2011 Census⁶ suggests that 1,444 working age residents from the Black Country travelled to work in Stafford and 2,381 working age residents from Stafford travelled to work in the Black Country. This would suggest that there was a net loss of -937 residents who travelled each day from Stafford Borough to the Black Country to work. Of these, 594 Wolverhampton working age residents travelled to work in Stafford and 1,146 working age residents from Stafford travelled to work in Wolverhampton.

Our evidence suggests that Stafford and the Black Country have a functional relationship and as part of the Duty to Co-operate we would welcome the opportunity to work with Stafford Borough Council to produce further technical evidence to support our initial analysis.

Growth Options

ABCA acknowledges the stepped process that Stafford Borough has undertaken to consider all reasonable growth options in order to determine the most appropriate development strategy for the New Local Plan. The NPPF clearly states the priority to focus housing and employment supply in the most sustainable locations which are (or will be) well served with supporting infrastructure.

Having reviewed the spatial scenarios and reasonable options in the Issues and Options consultation, we would support Scenario E (potential to deliver 12,942 homes, 12,472 jobs and 133ha of employment land) as the option that best meets the needs of Stafford Borough's future housing and economic growth aspirations for the following reasons:

- It reflects the key development and regeneration proposals for Stafford Borough Council;
- It reflects the Council's growth aspirations to increase its population and working age households;
- Any growth aspirations identified by Stafford Borough will rely on net in-migration into the Borough as natural change is negative due to an ageing population. Increased employment and housing opportunities in the Borough, above the LHN, will enable the formation of new and younger households and reduce the current level of outward commuting from the Borough to neighbouring local authorities;

⁵ Based on (National Health Service Central Register, Patient Register Data System (PRDS) and the Higher Education Statistics Agency (HESA) data

⁶ ONS, 2011 Census WU02UK - Location of usual residence and place of work by age

- The potential New Garden Community will provide the opportunity to deliver a significant housing and economic development opportunity through the delivery of substantial employment opportunities, high quality housing, local services and transport infrastructure as part of a planned new settlement;
- In line with Government aspirations, the proposed New Garden Community initiative will help to deliver the homes and infrastructure needed for both neighbouring communities and future residents;
- We feel that this proposal will provide the opportunity for some of the Black Country's unmet housing and employment land needs to be accommodated in Stafford Borough as part of the Duty to Cooperate.

If this scenario is to be taken forward as Stafford Borough Council's preferred option in the next stage of its Plan review, we would request that in the region of 1,500 to 2,000 homes be apportioned to meet housing needs arising in the Black Country. This is based on the assumption that 300 homes could be delivered per annum in a new settlement between 2030 to 2040. We would welcome the opportunity to work with Stafford Borough Council to consider this in more detail following the Issues and Options consultation.

Turning to employment, we would request that between 35 to 40 ha of employment land be apportioned to meet needs arising in the Black Country. Again, this is based on the assumptions set out in the EHDNA that approximately 30% of the total employment floorspace (approximately 44ha) may be expected to be constructed in the plan period of 2030-2040. Using this assumption, we would envisage approximately 4.5/5ha of employment land to be delivered per annum providing between 35 to 40ha over an eight-year period.

Potential location for Garden Communities

ABCA supports the potential for Meecebrook (Option D) to be allocated as a new Garden Community. The site has the potential to provide up to 11,500 new homes and related employment uses, which will be to the mutual benefit of Stafford and the Black Country.

We note that the site assessment work undertaken by AECOM suggests that Meecebrook, along with Hixon (Option E), offers one of the most suitable options for the location of a new sustainable settlement, subject to investment in the provision of a new railway station and related public transport improvements. Whilst Hixon has the potential to deliver a new settlement, albeit at a much smaller scale than Meecebrook, it is our view that a larger settlement such as that which could be accommodated at Meecebrook will in the longer term be the most sustainable option and is not within the Green Belt. A new settlement of this scale will generate sufficient housing provision and employment uses to justify significant infrastructure and transport improvements. Alongside this, it is our view that the site is the most sustainable in terms of its accessibility to the Black Country via both the mainline rail network (with the potential for a new railway station) and the M6 highway network.

A settlement of this size will achieve the Government's aspirations to provide new settlements of a sufficient scale to be largely self-sustaining and genuinely mixed use, whilst providing opportunities for significant long-term housing and economic growth in a local area.

In the meantime, the Black Country Council's would welcome the opportunity to work with Stafford Borough in a positive and constructive manner through the preparation of the new Local Plan.

I trust you find this information helpful and if you require any further details please contact me.

Yours sincerely,



Vicki Popplewell
Principal Planning Officer
Regeneration & Enterprise
Dudley Council (on Behalf of the Black Country Authorities)

Appendix One: Association of Black Country Authorities Response to Specific Consultation Questions

Question 1A

Is the evidence that is being gathered a suitable and completed list

We would suggest that Stafford Borough Council may wish to undertake further evidence work on household migration and commuting patterns between Stafford and the West Midlands local authorities as part of the development of its preferred option.

Question 5.B

a) Which Annual Housing Requirement figure do you think will best meet Stafford Borough's future housing growth requirements?

We would suggest that an annual housing requirement of 647dpa (Scenario E) would best meet Stafford's future housing growth requirements as this reflects the key development and regeneration proposals for Stafford Borough Council and reflects the Council's growth aspirations to increase the Borough's population and working age households.

Question 5.C

a) In calculating the Housing Requirement figure for the Local Plan 2020-2040 should a discount be applied to avoid double counting of new dwellings between 2020-2031? If a discount is applied should it be the full 6,000 new homes currently accounted for in the adopted Local Plan or a reduced number?

We understand Stafford Borough's reasoning and support the need for the discount to avoid double counting.

Question 5.F

a) In respect of these potential spatial scenarios do you consider that all reasonable options have been proposed?

Yes. In particular we feel that the development of a sustainable new settlement presents a unique opportunity to drive forward the realisation of Stafford's economic growth ambitions as well as increasing the Borough's population and working age households and reducing the current levels of out commuting

Question 5.G

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

Yes

- b) **If you think that the Garden Community/Major Urban Extension approach is appropriate which of the identified options is the most appropriate?**

ABCA supports the potential for Meecebrook (Option D) to be allocated as a new Garden Community. The site has the potential to provide up to 11,500 new homes and related employment uses, which will be to the mutual benefit of Stafford and the Black Country.

We note that the site assessment work undertaken by AECOM suggests that Meecebrook, along with Hixon (Option E), offers one of the most suitable options for the location of a new sustainable settlement, subject to investment in the provision of a new railway station and related public transport improvements. Whilst Hixon has the potential to deliver a new settlement, albeit at a much smaller scale than Meecebrook, it is our view that a larger settlement such as that which could be accommodated at Meecebrook will in the longer term be the most sustainable option.

A new settlement of this scale will generate sufficient housing provision and employment uses to justify significant infrastructure and transport improvements. A settlement of this size will achieve the Government's aspirations to provide new settlements of a sufficient scale to be largely self-sustaining and genuinely mixed use, whilst providing opportunities for significant long-term housing and economic growth in a local area

Question 5.H

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

Yes

- ii) **N/A**

- iii) **Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document?**

No.

Question 5.I

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

Yes. We consider the development of a sustainable new settlement with substantial housing and employment growth and its own supporting infrastructure and public transport and connectivity improvements presents a unique opportunity to drive forward the realisation of Stafford's economic growth ambitions as well as increasing the Borough's population and working age households and reducing the need to travel.

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 its Plan-Making process?

We would support:

- **Growth Option Scenario E** -This scenario best reflects the Borough's growth aspirations and the ability to accommodate unmet need arising from neighbouring local authorities (such as the Black Country) with strong migration and commuting links with Stafford.
- **Discount** -We understand and support the need for the discount.
- **Garden Community** - Development of a sustainable new settlement presents a unique opportunity to drive forward the realisation of Stafford's economic growth ambitions as well as increasing the Borough's population and working age households and reducing the current levels of out commuting.

Question 5.K

Do you consider the EDHNA recommendations for an Employment Land requirement of between 68-181ha with a 30% (B1a/B1b): 70% (B1c/B2/B8) split reasonable?

Yes.

Having reviewed the evidence and spatial scenarios in the Issues and Options consultation, we would support the recommendation for an employment land

requirement between 68-181 ha of employment land as this best meets the needs of Stafford Borough's future economic growth.

Having considered the reasonable options in the Issues and Options consultation, we would support Scenario E (potential to deliver 12,472 jobs and 133ha of employment land) as the option that best meets the needs of Stafford Borough's future economic growth aspirations for the following reasons:

- It reflects the key development and regeneration proposals for Stafford Borough Council;
- It reflects the Council's growth aspirations to increase its population and working age households;
- Any growth aspirations identified by Stafford Borough will rely on net immigration into the Borough as natural change is negative due to an ageing population. Increased employment and housing opportunities in the Borough, above the LHN, will enable the formation of new and younger households and reduce the current level of outward commuting from the Borough to neighbouring local authorities.
- The potential New Garden Community will provide the opportunity to deliver a significant housing and economic development opportunity through the delivery of substantial employment opportunities, high quality housing, local services and transport infrastructure as part of a planned new settlement;
- In line with Government aspirations, the proposed New Garden Community initiative will help to deliver the homes and infrastructure needed for both neighbouring communities and future residents;

We feel that this proposal will provide the opportunity for some of the Black Country's unmet employment land needs to be accommodated in Stafford Borough as part of the Duty to Cooperate.

The Black Country economy has been performing well and is considered strong. Our future employment land requirement ranges between 592ha (baseline growth) to 870ha (aspirational growth based on West Midlands Combined Authority SEP). Our existing supply (including completions) provides approximately 305ha of land leaving a shortfall of between 263ha – 500ha depending on the two growth scenarios set out above. We would request that between 35 to 40 ha of employment land be apportioned to meet needs arising in the Black Country. Again, this is based on the assumptions set out in the EHDNA that approximately 30% of the total employment floorspace (approximately 44ha) may be expected to be constructed in the plan period of 2030-2040. Using this assumption, we would envisage approximately 4.5/5ha of employment land to be delivered per annum providing between 35 to 40ha over an eight-year period.

Question 5.L

Do you agree that the assumptions made in the EDHNA about the need to replace future losses of employment land are reasonable?

Yes

Question 6A

- a) **What level of employment space provision for the Plan Period 2020-2040 do you consider to be optimal?**

We would support Scenario 2: CE Job Growth: Policy On as this is reflected in Growth Scenario E

Question 6C

Which specific locations (if any) do you think would benefit from the increased provision of employment premises? If so, what type of activity?

We support the potential for Meecebrook (Option D) to be allocated as a new Garden Community. The site has the potential to provide up to 11,500 new homes and related employment uses, which will be to the mutual benefit of Stafford and the Black Country.

We note that the site assessment work undertaken by AECOM suggests that Meecebrook, along with Hixon (Option E), offers one of the most suitable options for the location of a new sustainable settlement, subject to investment in the provision of a new railway station and related public transport improvements. Whilst Hixon has the potential to deliver a new settlement, albeit at a much smaller scale than Meecebrook, it is our view that a larger settlement such as that which could be accommodated at Meecebrook will in the longer term be the most sustainable option.

A new settlement of this scale will generate sufficient housing provision and employment uses to justify significant infrastructure and transport improvements. A settlement of this size will achieve the Government's aspirations to provide new settlements of a sufficient scale to be largely self-sustaining and genuinely mixed use, whilst providing opportunities for significant long-term housing and economic growth in a local area

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 your reasons.

Yes.

Question 12.B.

- a) **Do you agree with the approach to widening the choice of transport solutions through large scale redevelopment in key locations across Stafford Borough, related to the existing network?**

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	Ian	
Surname	Dickinson	
E-mail address	[REDACTED]	
Job title (if applicable)	Area Planner	
Organisation (if applicable)	Canal & River Trust	
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 Ian Dickinson		Organisation Canal & River Trust		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?				
Section	2	Paragraph		Table
Figure		Question		Other
2. Please set out your comments below				
<p>The Canal & River Trust (the Trust) is the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is also a statutory consultee in the Development Management process.</p> <p>Within Stafford Borough the Trust owns and operates (as Navigation Authority) over 50km of canals, comprising parts of the Shropshire Union, Trent & Mersey and Staffordshire & Worcestershire Canals. These canals are important features within the Borough, passing through both urban and rural areas. Canals are a multi-functional resource, being a valuable 200 year- old historic asset forming part of the industrial heritage of the area as well as providing an important green infrastructure asset and wildlife habitat. They also provide a free to use leisure and recreational resource for both local communities and visitors.</p> <p>The value and potential of these inland waterways should therefore be acknowledged within the Local Plan and highlighted within the Spatial Portrait in Section 2.</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
Figure		Question		Other
2. Please set out your comments below				
<p>The Land East of Weston option has the potential to affect the Trent & Mersey Canal, which passes immediately to the west of the area identified. The canal is a conservation area and any potential development needs to take account of the importance of the canal as a designated heritage asset and should ensure that the significance of the canal as a heritage asset is preserved or enhanced.</p> <p>If this option is pursued further, we recommend early discussion with the Canal & River Trust to identify any potential impacts on the canal and also whether there may be opportunities, such as creating links to the canal towpath to encourage use of the canal as a leisure and recreational resource, which should be considered. Improvements to the canal infrastructure, such as resurfacing the towpath, may need to be considered, and should be the subject of developer contributions if this option is pursued as part of the Local Plan.</p>				

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation				
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paper does this representation relate to?					
Section	6	Paragraph		Table	
Figure		Question	6L	Other	
2. Please set out your comments below					
<p>The Canal & River Trust considers that Policy E7 requires adjustment. Policy E7 restricts permanent residential moorings in locations away from settlements in the settlement hierarchy but does not offer any clear justification for not permitting any residential moorings in such locations.</p> <p>In relation to achieving sustainable development we appreciate why a restrictive approach is taken in relation to development proposals in the countryside. We do however consider that it is unreasonable to seek to prevent any permanent residential moorings away from the settlements identified within the settlement hierarchy.</p> <p>Moored boats constitute an inherent part of the waterway scene and are far less intrusive features than built housing development. Residential moorings can offer an alternative form of living accommodation, and inland waterways are 'non-footloose' assets; i.e- the location and alignment of waterways are fixed. Such assets have locational requirements arising from this inherent constraint, and as such, it may be the case that the settlements identified in the hierarchy will not necessarily be able to provide appropriate mooring locations, particularly as the majority of the canal network lies in rural areas beyond these settlements (some of which are, in any event, not located near to the canal network). We consider that it is important to assess each potential new residential mooring site on a case by case basis and to apply relevant "sequential" planning policies where appropriate rather than impose a blanket ban as Policy E7 currently does.</p> <p>We further comment that this restriction also appears to preclude residential moorings within marina developments which may be specifically included to provide on-site security/management accommodation, associated with the safe and smooth operation of the marina/moorings.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	11	Paragraph	11.8	Table	
Figure		Question		Other	
2. Please set out your comments below					
<p>The Trust considers that the health and wellbeing of local communities is an important consideration, and new development should always be required to consider how it can help to maximise opportunities for people to pursue healthier and more active lifestyles. We believe that the canal network within the Borough can play a valuable role in encouraging people to be more active, providing communities with an accessible green space, offering significant benefits to health and well-being. Canals offer a real opportunity for supporting and promoting healthier lifestyles and helping to improve the physical and mental wellbeing of local communities by encouraging people to be more active, whether through leisure and recreation (including activities such as canoeing as well as walking or cycling) or offering a more active travelling option that is a sustainable alternative to using private motor cars to access services and facilities. We consider that any specific health policies within the Plan should acknowledge this and support measures to promote use of the canal network as a resource for the whole community to use.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	12	Paragraph	12.5	Table	
Figure		Question		Other	
2. Please set out your comments below					

Canal towpaths can play an important role in providing a walking and cycling route both as a sustainable commuting route for travelling to and from work or to access services and facilities, as well as a recreational route. This can help to widen transport choices and encourage more sustainable modes of travel. New development proposals adjacent or near to the canal network should consider this and the potential to create new links or enhance existing links to the canal towpath as well as identifying improvements to towpath surfaces. For the towpath to fulfil this important role as part of the wider walking and cycling network across the Borough, it needs to be in a condition that encourages widespread use by the local community, and this sometimes requires improvements and often increases the Trust's maintenance liabilities. Where new development has the potential to generate increased footfall on the towpath and/or to facilitate easier access to it, the Trust already looks to see whether a case can be made to secure a developer contribution towards maintaining or improving the towpath surface to help it cope with increased use.

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



Liz Harrington-Jones, [REDACTED]
(Clerk and Responsible Finance Officer)
[REDACTED]

Planning Team
Stafford Borough Council
Civic Centre
Riverside
Stafford ST16

21 April 2020

Dear Sirs

Review of Local Plan for Stafford

Chebsey Parish Councillors would welcome an early and thorough investigation into the advantages of the Community Infrastructure Levy (CIL) over Section 106 payments, as the former would provide significant benefits for rural communities.

Chebsey Parish Councillors would have welcomed further information on the proposed sites for the construction of Garden Village(s) in the Borough, and questioned whether the developments were commensurate with SBC environmental proposals. There would need to be a robust strategy in place, with relief roads to cover blockages and delays on the M6, before any major construction in the Borough commences, and a preferred option would be for additional housing to be shared between a number of communities rather than concentrated on one or two large sites.

It would be difficult to retain the identify of individual villages, for example there is a danger that the Garden Village proposed for the Meece Brook site would overwhelm Swynnerton village; large developments might be better sited on urban brownfield sites.

There were concerns about the suitability of the suggested Meece Brook site due to the clearance costs that would be incurred on a former munitions and military site. The Parish of Chebsey has recently suffered extensive disruption from major Network Rail works and is now facing similar disruption for HS2 working; further disruption will come as the utilities (gas, electricity, water) for the proposed Garden Village will come through the Parish.

Recent experience of flooding at a number of sites in the Borough has highlighted the importance of effective land management and the more mundane regular clearing of gullies etc, as well as the importance of siting any developments away from flood prone areas.

However the Borough decides to move forward, it will be essential for effective monitoring and enforcement procedures to be built into the construction of any new developments, so that problems can be promptly addressed. Infrastructure for developments will need to be incorporated in a timely and enforceable manner to

ensure that amenities are available for residents as soon as possible after they move on to the site

With kind regards

Yours faithfully

Liz Harrington-Jones
Clerk and RFO, Chebsey Parish Council

Background

These representations on the Stafford Borough Local Plan 2020-2040 - Issues and Options Consultation Document - February 2020 are made by the **Campaign to Protect Rural England (Staffordshire), registered charity number 219443**. CPRE promotes and encourages the protection and improvement of the countryside of Staffordshire, its towns, villages and rural environment.

We are pleased that you are making good progress on revising the current Local Plan and extending its end-date to 2040.

Thank you for notifying us of the consultation. Our response below follows the Council's ordering of sections.

Our representations on the consultation are summarised below, with more detailed representations in the Appendices.

Section 1 Introduction

We found the introductory chapter to be helpful and welcomed the work which has been done by the seven Scoping Panels. We agreed with almost all of the views expressed. We have particular concerns about the lack of reference to the new settlements and other aspects of the Settlement Assessment – were these considered by the Panels at all?

We welcome your statements in Paragraph 1.2 about the purpose of the plan and in Paragraph 1.3 on how you are responding to Government requirements. We think that it is prudent to accept the new regulations and revised NPPF and the standard housing methodology.

We have concerns, however, that you appear to go beyond your own brief in some sections of the consultation and we will look carefully at this issue when you publish preferred options and revised policies.

Section 2 Spatial Portrait

In the Spatial Portrait we were surprised to see the inclusion of proposals for development which do not have consent and the section titled a New Garden Settlement. These seem out of place in a spatial portrait which is otherwise focussed on what exists, is committed or is a major proposal by National Government affecting the Borough.

We were surprised to find the only reference to HS2 in the comment that it “may deliver an integrated station in Stafford” but with no reference to the impact of the line through the Borough - which we consider to be a fundamental issue. We would comment that, although the HS2 route runs across the Borough, its route and the implications are not referred to at all.

There is no new station proposed on the HS2 route through Stafford Borough and we think that this should be made clear – as should the major proposed construction and maintenance depot at Stone/Yarnfield. We find these omissions surprising.

Section 3 Vision and Strategic Objectives

We would not suggest that the Vision needs more than updating.

We think that it would be preferable to give real, measurable, targets for the Vision. We would also hope to see objectives with greater realism as to what the Council cannot/will not do, e.g. public transport provision, as well as being clear on what the Council is committed to and can demonstrate. We feel that doing this would be more honest, straightforward and realistic.

We do not consider that the Council is meeting aspects of the Vision and Objectives and have given examples in Appendix A of this response.

Section 4 Sustainability and Climate Change

The recognition of the Climate Emergency is referred to in the first paragraph. We think that in the last Local Plan the Council could have done much of what is now envisaged – but chose not to.

If the Council is now serious about countering Climate Change it could indicate that it now expects applicants to provide evidence of the attempt to move towards carbon neutrality and greater sustainability to be demonstrated by applicants in all new developments for which the Council considers planning applications. (See Paragraph 4.5 of the Consultation Document). We think that the Council does not need to delay for more than two years to await the adoption of the revised plan to make a start on this.

We will evaluate the Council's Preferred Options and later documents against the sustainability tests which follow from this section of the Consultation Document and by using the Council's Climate Change Adaptation and Mitigation study when this is available. (We welcome its production.)

Section 5 The Development Strategy

We think that an **appropriate, sustainable, Development Strategy** is the key both to the review of the existing plan and future reviews of the new plan in 2015 and 2020. Vital to this is the level of housing to be provided and **this is the main element of our representation.**

We believe that the **Council would be prudent in accepting the 2019 NPPF** (paragraphs 59-67) which requires local authorities to meet locally established needs. "This should be informed by a local housing needs assessment, conducted using the standard method in national guidance unless exceptional circumstances justify an alternative approach." **We agree with the Council that exceptional circumstances do not justify the deviation from the Standard Method.**

A Housing Requirement of 408 dwellings per annum (dpa) is calculated when using Standard Government Local Housing Need methodology 2019-2029 for Stafford Borough¹; **We accept that 408 dwellings per annum (dpa) is both defensible and achievable.** It will also generate new Homes Bonus payments to the Council in a similar range as currently (£2 million to £3 million).

We believe that if 408 dpa is used as the baseline for housing allocations it would be possible to **accept additional housing on brownfield windfall sites above the baseline number.**

If the Council proposes a higher baseline number, it would have an adverse impact on the 5 year land supply - which is used by developers to argue for more greenfield development (as happened in the early years of the current local plan).

Earlier in the current plan period both your Council and Inspectors in appeals granted consents on unallocated greenfield sites leading to the over- provision which the Borough Council is now aware of. This has also happened last year in nearby Penkridge in South Staffordshire, where, despite an adequate allocation for housing having been accepted by the Local Plan Inspector less than a year earlier, a substantial unallocated greenfield site was allowed on appeal. **We think that by using the Government's requirement of 408 dpa as a baseline, your Council's 5 year supply will be retained and defensible on appeal.**

We recognise that Scenario D is rather higher than the best 'fit' to the baseline housing numbers above - but this could be reduced by the Council. As currently included in Scenario D this would mean an additional 18,653 in-migrants, translated into a housing requirement of 9,773 additional homes (489 dpa). **We would support this strategy but only with 408dpa as a baseline.**

We oppose the much higher numbers of 711 dpa (Scenario E) – 303 over baseline, 746dpa (Scenario F) - 338 over baseline, and 597dpa (Scenario G) – 189 over baseline. Growth Options

We accept Scenario A which accords with Government Local Housing Need methodology 2019-2029 as defined by 2019 PPG.

We recognise that the Council does not wish to pursue Scenarios B and C we accept the reasoning and do not oppose this.

We would prefer not to accept the PCU addition implicitly advocated in the document. (This does not appear to be identified as a requirement in the Housing Need Methodology.)

¹ As stated in Table 8A and elsewhere in the consultation.

We accept Scenario D as meeting the Council's wish for growth by increasing population by attracting 18,000 new migrants (net). This option could include the Stafford Gateway. We support the principle of the Stafford Gateway as it is a more sustainable location which would reduce the loss of greenfield sites.

Similarly, if the Council ultimately proposes a New Settlement at Meecebrook the early stages of this could also be accommodated under Option D - with development continuing well beyond 2040.

We consider that **Scenario E** requires excessively higher growth. We see no reason why the Stafford Gateway requires this level of growth.

We strongly oppose this option.

Scenario F involves inward migration of over 29,000 people, a growth in population of 21% based on major employment growth which is likely undesirable, unfeasible and unachievable within 20 years.

We oppose this option.

Scenario G involves significant numbers of new homes and a major growth in jobs. We question the justification for either.

We oppose this option.

Affordable Homes

It is considered laudable that Stafford Borough Council has a policy to 'Deliver 500 new homes including 210 affordable homes each year by working with developers and Registered Providers'. Under this policy 42% of new homes were to be affordable. Unfortunately, in relation to affordable housing, the Borough Council has failed to meet its target with only 27% of new homes being categorised as affordable (See Appendix C). This is despite significant numbers of affordable homes being completed on purely publicly funded schemes on publicly owned land.

We do not consider that increasing the amount of market housing will be the panacea for the continuing underperformance.

Discounting

In the first 8 years of the plan period the completion target was exceeded despite the inevitable lag in the early years following the adoption of the plan. In the last four years Land for New Homes 2019² shows that 3260 homes were completed. This shows that an annual average of more than 800 dwellings were completed - against a local plan target of 500 per annum.

² In Table 1

In Appendix B we demonstrate, using the Council's own published information, that build rates have exceeded the already high targets of the adopted Local Plan. On the basis of commitments in March 2019, 8 years into the plan period, the proposed 10,000 new homes number is projected to be exceeded by more than 16% and, if this continues, more than 13,000 new homes would be completed by 2031.

No evidence has been put forward by the Council to justify discounting and it is considered to be illogical and unreasonable to suggest that these committed developments, and many more, will not take place in the new plan period.

Planning commitments and outstanding Local Plan allocations should not be discounted, there is no justification for this.

Windfalls

The consultation document has failed to take account of the scale of windfall development permitted but not allowed for in the plan. Where these sites have been on brownfield land we can understand the granting of consent and we have not opposed this. Land for New Homes 2019 showed that in the 8 years from the current plan's adoption 56% of completions were on windfall sites with 44% on allocated sites³. We regret that, despite this, **no allowance is being made for windfall sites.**

Green Belt

We welcome the Council's stance on defending the existing Green Belt.

Brownfield v Greenfield

We regret that all of the housing allocations in the existing plan are on greenfield sites and none at all on brownfield. We also greatly regret that in the Local Plan Review no indication is given of the **intention to give priority to brownfield sites** despite the statement made in paragraph i. of the Council's Vision statement and National Policy in NPPF.

As with the previous issue of the NPPF, the most recent version sets out the need to maximise the use of previously developed sites and affords "substantial weight" to the use of brownfield sites within local policies and planning decisions to meet development needs. As well as maximising the use of these sites, Paragraph 119 in the NPPF also notes that Local Authorities should be proactive in identifying and helping to promote brownfield sites. **We question the Council's commitment, when assessed by its actions in the previous Local Plan, and hope that this will be given higher priority in future.**

³ Figure 3

Settlement Hierarchy

We are strongly **opposed to the changes in the Settlement Hierarchy** and the new categorisation of settlements. We have given reasons for this in the attached Appendix A. We are also against the Borough Council making new, additional, housing allocations in smaller settlements as we consider that this is more appropriately a matter for local people and elected parish councils to consider.

If parish councils and their residents wished to see new housing in unclassified settlements this could be done more appropriately through Neighbourhood Plans and Neighbourhood Development Orders - as could changes to development boundaries included in Part 2 of the existing Local Plan.

New villages/settlements/town on greenfield sites

We see no tenable case for any of the six new settlements on primarily greenfield sites at:

Section 5.34

- i. Land north and east of Gnosall: up to 3,500 new homes and supporting employment. **We oppose this location.**
- ii. Land between Gnosall and Haughton north of the A518 between Stafford and Newport. This area of land could accommodate up to 3,250 new homes and supporting employment. **We oppose this location.**
- iii. Seighford, a largely agricultural site with an airfield and established employment land either side of the B5405 to the west of Stafford town. This area of land could accommodate up to 5,250 new homes and supporting employment. **We oppose this location.**

Some of these sites are on land currently belonging to the county farm estate. In a letter to CPRE Staffordshire dated 19 March 2020, Cllr Mark Winnington stated that "Staffordshire County Council has been renting farms since 1908 and still cherishes the role the county farms estate plays within our rural community." A recent report by the national CPRE charity noted that county farms are a 'vital first rung on the farming ladder' for newcomers to a sector that has high up-front capital costs, and it is therefore important that such sites are retained and not sold off for development.

https://www.cpre.org.uk/wp-content/uploads/2019/12/December-2019_Reviving-county-farms.pdf

- iv. Land to the north of Redhill Business Park and to the west of the A34 near to M6 Jn14 Stafford North. A large tract of land that could

accommodate up to 5,000 new homes and supporting employment land. **We oppose this location.**

Meecebrook, focussed around Cold Meece south of Swynnerton. This has the potential for up to 11,500 new homes and supporting employment land raises different issues.

We acknowledge that the Council now seems committed to this as a proposal and await consultation on what is actually envisaged. **We acknowledge that this site appears to be predominantly or entirely on PDL (brownfield land) but have numerous questions regarding sustainability, accessibility etc.**

- v. Hixon. An ex-WW2 airfield located to the east of the Borough. Much of the site is currently unused and is partly developed as an industrial park. The site on the edge of Hixon could be expanded to accommodate up to 2,750 new dwellings and supporting employment land. We question whether this site could be fairly regarded as PDL. **We oppose this location.**
- vi. Land East of Weston. There are a number of environmental constraints in this area but there is potential to bring forward up to 2,000 new homes and supporting employment land. **We oppose this location.**

Potential Spatial Strategies

These strategies and their accompanying diagrams appear to have been taken from an undergraduate planning textbook - more relevant to academic than real world consultation in the circumstances of the review and rolling forward of Stafford Borough Council's already adopted Plan.

We are very disappointed in the Council's adoption of this approach.

Section 6 Delivering Economic Prosperity

Scale of land for Employment Development

We have major concerns about the EDHNA and the scale of new floorspace envisaged in the various scenarios with the largest (176,548m² being more than 10 times the floorspace of the lowest (17,548m²)⁴.

We regret that the consultation document does not convert the scenarios to an estimated hectareage of 'new Greenfield land' to be developed. This would have allowed a comparison with the scale of development of the current local plan and an indication of the additional land area proposed.

⁴ Paragraph 5.7 of the consultation

Unlike what has been done in respect of housing we have not found any assessment of the take up of employment development land since the beginning of the current plan period. There does appear to be anecdotal evidence, however, that some large areas of land have generated few jobs or other benefits e.g. the JLR storage area at Stone.

There does not appear to have been any reference made in the document to the number of new jobs expected to be created under the various scenarios - which do not appear to be linked to the scenarios for increasing population by inward migration and, as a consequence, to the number of additional dwellings which would be required. We would welcome employment and housing provision being clearly linked.

As in the current plan it would appear that further major greenfield loss would be envisaged. **We would oppose the high levels of development included in the scenarios** (as we do for new housing).

Section 7 Delivering Town Centres that Address Future Needs

Stafford Town Centre

We have particular concerns in relation to Stafford Town Centre, where the vacancy rate of shops, offices and public buildings, such as the Magistrates' Courts, is at a historic high. Many of the vacancies are long term and buildings and streets, e.g. Market Square, are showing a lack of maintenance, with parts of the centre feeling run-down.

We accept that retail has changed and the loss to the centre of shops like Next, Currys and Halfords to retail parks was inevitable. The relocation of M&S, several Burton Group retailers and others is regrettable because it has increased an already high vacancy rate, but at least the stores have stayed in the town for now.

We also accept that the impact of the Internet on retailers and high street users, such as banks and building societies, is being strongly felt as companies fail or contract. The Council cannot prevent this. We are aware that the high costs of bricks and mortar retailing is showing at the high rate of retailers closing and very few new companies seeking new premises in town centres. This is likely to continue and increase as a result of the long-term impact on the country of Covid-19.

We think that the Council's focus now, and in the future, should be to stop the decline, facilitate better maintenance of the public realm and encourage the use of shop windows. Boarding up is hastening the decline. Other centres are putting displays in shops etc – as the Borough Council has done in some cases, such as in the vacant units under the Council's offices.

We feel, however, that the Council has now allowed too much new retail and that this has hastened the decline of the historic centre (especially as a

number of shops have re-located to the Riverside development) - yet the TCCA appears to seek to continue this overprovision and encourages yet more retail and other development on the edge of the centre - while vacancies continue to increase and vibrancy is lost.

We find the decline of the centre to be very sad and hope that the Council will try act to attract new retailers to existing vacant premises, to reduce vacancy levels, and carry out improvements to frontages. We do not believe that significant population increases will reverse the trend.

In particular, we hope that the Council will not encourage more new retail development, such as new retail parks and other out-of-centre retailing, which detracts from the centre itself and will hasten decline elsewhere. Perhaps this could form the basis for policy?

Section 9 Delivering Housing

Whilst we welcome the emphasis given in para 8.5 to 'Making Preferential Use of Brownfield Land', we regret that, despite what is said about giving priority to brownfield, **all that we find in the existing allocations are greenfield sites** - in a plan which makes **no allowance for brownfield sites**. We think that this is a real issue where the Council is being led to 'turn a blind eye' to the role of windfalls; despite Land for New Homes 2019 saying in paragraph 3.5, "Since the start of the plan period **54% of completions have been on PDL.**" (PDL- previously developed land - is also described as 'brownfield'; the terms are synonymous).

We are disturbed to note that the consultation document implies that, with the exception of Meecebrook and near Stafford station (these seem to be accepted as 'done deals'), all new housing and employment allocations will be on greenfield sites; we regret and continue to oppose this approach.

Analysis of councils' brownfield land registers by the national CPRE charity suggests that there is enough suitable brownfield land in England for more than 1 million homes across over 18,000 sites and over 26,000 hectares.

<https://www.cpre.org.uk/resources/state-of-brownfield-2019/>

Section 9 Delivering Quality Development

We welcome the changes to policy suggested by this section.

You may wish to refer to a new report by CPRE and the campaigners Place Alliance, based at UCL, called A Housing Design Audit for England. This found that, overall, 75% of new housing development should not have gone ahead due to 'mediocre' or 'poor' design. Less affluent communities are ten times more likely to get worse design, even though better design is affordable – and 94% of developments in the rural areas audited should never have been given approval to go ahead.

Good housing design includes well-designed access roads, provision of storage, spaces for bins, suitable car parking provision and local community facilities. In good housing design, architecture is in keeping with the local area and the new developments have character, bring about a sense of place and are energy-efficient and sustainable – including making space for people to walk and cycle.

<https://www.cpre.org.uk/news/housing-design-2020/>

Section 10 Environmental Quality

We would have hoped for a policy of improvement - rather than maintenance.

Section 11 Health and Wellbeing

We would like to see this taken more seriously in the reviewed plan.

Section 12 Connections

We hope that more positive action is taken in the future to meet the stated aims rather than the current approach - e.g. **from now on** requiring new housing and employment to be designed for, and served by, public transport - and also to try to redress this omission on the large developments which have taken place in the last nine years.

Section 13 Viability and Delivery of Development

We regret that the Council has totally failed to deliver CIL.

We are disappointed that, despite its robust policy on affordable housing, the Council has, in most cases, manifestly failed to deliver this.

Local infrastructure such as transport improvements are almost totally absent. This is a broader issue than just transport and should include, for example, redressing inadequate community and medical facilities.

New open space to serve additional housing is massively below national standards and could be seen as a major failure.

We really hope that the Council will take these issues much more seriously in the future and will consider using at least an appreciable part of the national Government's 'New Homes Bonus' - of more than £11,000,000 paid to Stafford Borough Council in the last 5 years - to provide targeted funding for the existing deficiencies.

Appendix A

The Vision

Question 3A

a. retained and enhanced its high quality unique character made up of the County Town of Stafford, the market town of Stone and extensive rural area containing smaller towns and historic villages;

Has this happened, what is the evidence?

b. provided high quality designed developments including recreation, open space and sport provision;

Perhaps the Council could identify examples of developments of high design quality. Despite the number of new homes completed since the start date for the plan – around 4,000 - recreation, open space and sport provision does not appear to have increased proportionately but has, in reality, declined.

c. a range of housing types and tenures to meet the needs of the Borough, including for the ageing population, affordable housing and provision for gypsies and travellers;

Affordable housing has failed to meet the Council's stated targets and this situation seems likely to worsen. Has the Council made any new provision at all for gypsies and travellers?

d. reduced the need to travel, through the provision of increased services and facilities in key locations to sustain the surrounding rural areas;

Services and facilities in and to serve surrounding rural areas appear to have declined rather than increased.

The need to travel appears to have increased, yet even those areas that have seen major growth, such as Eccleshall and the Haywoods, have not seen improvements in public transport.

e. addressed issues of climate change, including a reduction of carbon emissions and flood risk with sensitively delivered renewable energy schemes;

Little seems to have been done to address climate change, such as requiring new developments to move towards carbon neutrality. No new housing, employment or other developments appear to have been required to meet higher than minimum permitted insulation standards, install solar panels or EV facilities. New housing and employment developments continue to primarily use carbon-based fuel, primarily gas, for heating and hot water, and do not use rainwater harvesting.

f. improved accessibility to services and facilities by providing safe, attractive and convenient sustainable connections from and to new developments;

It is unclear what is intended here; virtually none of the new developments have public transport provided or safe cycle routes built.

g. been protected, conserved and enhanced to provide an exceptionally high quality of environmental, historic and landscape character;

Little seems to have been done to provide environmental improvement or to enhance historic or landscape character – perhaps what has been done could be identified in the Review?

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;

All of the existing housing and employment allocations in the plan are on greenfield sites of environmental value. The plan made no allowance for the development of brownfield sites. Because no provision was made for windfall (unallocated) brownfield sites, more greenfield land has, and will be, developed than was/is appropriate.

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 as well as enhanced and managed historic environment and natural resources providing a clean, safe and enjoyable place to live and visit, facilitated by an improved road and public transport network.

No evidence seems to be available in respect of the first sentence. There is no visible evidence of the development of a strategic network of accessible green space, or a managed historic environment.

Despite the scale of new development, the public transport network has not improved – many residents consider that, in reality, it has declined in the borough. Major new housing and employment sites are unserved by public transport. Congestion and pollution are perceived as having increased.

Question 3B

The problem of the current Vision is not its length but its lack of achievement.

It would be preferable to give real, measurable, targets for the Vision. If this means abandoning the current Vision and Objectives to have one with greater realism as to what the Council will not do (the abandoned elements of the

Vision) as well as what it will actually commit to doing, this would at least be more honest, straightforward and realistic.

Question 3C

It should maintain a commitment to appropriate growth and require new development to be carbon-neutral.

Questions 3D, 3E and 3F

The objectives are as vague, woolly, unquantified - and as largely unmeasurable as the existing Vision. Making them thematic would not help.

Question 4A

Yes.

The Council could have done much of this in the last plan – but chose not to. If the Council is serious, it could indicate that it now expects evidence of the attempt to move towards carbon neutrality and greater sustainability to be demonstrated by applicants in all new developments for which the Council considers planning applications. It does not need to delay two years for the adoption of the revised plan.

Question 4C

Yes.

Section 5

The Strategy should first consider the appropriate level of growth for the Borough.

Question 5A

There is no need or purpose in repeating Government Policy – which changes much more regularly than a Local Plan. Government has previously advised against repetition.

Question 5B

- a. Option A as it provides both for local need and inward migration and would meet Government requirements.
- b. No, because the current Local Plan allowed for 30% of new housing for local need and 70% for inward migration of households. The identified total of 10,000 new homes by 2031 will clearly be exceeded due, in part, to the scale of new windfall developments - which were not allowed for at all in the plan.

Question 5C

All current commitments and allocations should be included in the calculation baseline for the new plan period 2020 to 2040 and those allocations not yet completed should be included as allocations in the revised plan.

Then, additional requirements should be identified and allocated as well as existing outstanding commitments and allocations.

Allowance should, in future, also be made for potential new 'windfall' sites; based on past trends - as has been done by other LPAs.

(Note:- Figure 3 of Land for New Homes 2019 shows that 56% of all housing completions 2011 – 2019 were on 'windfall' sites.)

No 'double counting' would be involved using this method.

Question 5D

i. No. There seems little purpose in identifying additional categories of settlements unless it is intended to include allocations and revised settlement boundaries.

ii. No.

Rural exception policies could still be applied to existing settlements (including those in Green Belt).

If parish councils and their residents wished to see new housing in unclassified settlements this could be done through Neighbourhood Plans and Neighbourhood Development Orders.

Note:- Including housing numbers without defining boundaries and allocations leads to over-provision of housing as has occurred in the first 9 years of the current plan period, for example at Gnosall and Eccleshall.

The areas identified in Tier 3 are already defined by Green Belt Boundaries and it would be inappropriate to use other boundaries - for the reasons given in Paragraphs 5.3 and 5.4 of the consultation document. For the most part these areas are contiguous with adjacent authorities - Clayton with Newcastle-under-Lyme, Meir Heath / Rough Close with Stoke on Trent and Blythe Bridge with Staffordshire Moorlands and Stoke-on-Trent.

Describing Tier 3 settlements as North Staffordshire Urban Areas is potentially misleading as there are other, similar, suburban areas in adjacent Councils' areas - which would meet the description but are not in Stafford Borough or its jurisdiction.

Question 5F

Intensification of Town and District Centres

- ***Commonly encouraged in Local Plans in line with NPPF but unlikely to provide sufficient brownfield land to meet needs.***

Accepted, but this should be encouraged where appropriate e.g. Stafford Borough Council's ideas around the station.

- ***Focus on housing and economy may conflict with other important functions of these centres***

The focus would not be solely on housing and the economy. For example, Stafford has a declining centre with the highest ever vacancy rates for retail uses. It needs re-vitalisation and better maintenance.

- ***Townscape character may be affected***

Good design would be expected in the future.

- ***There are usually good existing transport links, although they may already be at capacity***

In towns as small as Stafford and Stone this would not be an issue.

Garden Communities

- ***Depending on location, it may or may not be close to existing high quality transport corridors.***

The locations identified in Stafford Borough are not close to such corridors.

- ***Would need to be of sufficient scale to support provision of appropriate new infrastructure***

This really should be defined in terms of scale, financial assessment, facilities and programming.

- ***May have a negative environmental impact but could be designed to deliver environmental gains***

There is little evidence of environmental gains in previous cases in Stafford. The same could be said for any location.

- ***Designing a settlement from scratch provides opportunities for urban design principles to be followed throughout, such as Garden Towns principles.***

As they could have been for recent major urban extensions at Stafford - if urban design principles had been followed. The designation of a new settlement does not, of itself, result in higher standards than are accepted by the Council on other sites.

- ***A New Settlement would take a long time to be delivered.***

It would, and it is expensive to provide, often leaving residents lacking facilities such as schools, shops, community facilities and employment and being marooned without public transport or private cars to travel to other settlements.

Dispersal of development

This would involve spreading new development across the Borough including in smaller settlements.

- ***Smaller sites are unlikely to generate infrastructure needs alone so are unlikely to significantly contribute to improvements in infrastructure.***

Agreed, despite CIL.

- ***The character of smaller settlements might be adversely affected by new development***

Accepted.

- ***Expanding some smaller settlements can support local shops, pubs, bus services etc.***

There is very little evidence of this happening in practice. Shops have closed and pubs and bus services have been lost; even in larger settlements in the borough, despite growth.

- ***Smaller sites can improve deliverability rates.***

Is there any evidence of this at any scale?
Affordable housing is more difficult to deliver.
New developments are less sustainable.

Intensification around the edges of larger settlements and strategic extensions

- ***Can link into public transport networks***

But, unfortunately, in Stafford and Stone this does not seem to have been expected or required by the Council.

- ***Focuses development close to, and supports, existing services and connections.***

But can overstretch facilities such as doctors' surgeries and schools. Does not appear to lead to improvement.

In CPRE's view, intensification around the edges of larger settlements and strategic extensions is probably the best of the options canvassed by this consultation.

“String” settlement / settlement cluster: where development is focussed on a number of linked settlements. It could involve new and/or existing and/or expanded settlements.

- ***Need to be close to existing high-quality transport corridors.***

We do not agree that string settlements are a good option, given that this has the undesirable effect of separate settlements increasingly merging into one another, threatening the character of the community and surrounding landscape. For example, developing greenfield land between Gnosall and Haughton, opposed in 5.34 (ii) above, potentially turns a large and medium settlement into an out-of-town urban area. This is likely to result in further pressure on local amenities, reduced open spaces and their associated benefits for health and wellbeing, and increased traffic and air pollution.

- ***Relies on there being suitable broad locations available for this type of development.***

No evidence of this.

- ***May involve promoting development at some existing, small settlements which may significantly alter their character.***

Agreed.

- ***A number of smaller settlements could collectively be of sufficient scale to be served by shared infrastructure.***

We doubt that there is evidence for this. Evidence and examples?

“Wheel” settlement cluster

Focus on Stafford and surrounding settlements

- ***Similar to the “string” cluster approach allowing strong links between the towns but with less reliance on the encouragement of a “development corridor”.***
-

If this is being put forward as a serious option, the settlements should be identified – as has been done elsewhere in the consultation.

- ***Would build on existing settlements and their relationships***

Which settlements, what relationships?

- ***A number of smaller settlements in the same locality could be grown to generate sufficient supporting infrastructure***

Evidence for this? What supporting infrastructure?

- ***Character of the settlements and surrounding area might be adversely affected***

As in most of the options.

Question 5F

- a. These seem to have been drawn from a planning textbook
- b. & c. The first three seem to be preferable to the last three – see comments on each above.

Question 5G

- a. No.
- b. Unnecessary to meet the appropriate level of growth for Stafford Borough

Appendix B

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
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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
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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

Note:-

As at 31 March 2019 the completions, commitments and outstanding allocations exceeded the provision proposed in the Adopted Local Plan by 1645 (16.4% of 10,000). This number and percentage is likely to increase in the remaining 12 years of the Plan Period (e.g. from new windfall sites) - but no estimate of the increase seems to have been made in the current consultation document.

Supplementary Note:-

Key Service Villages

Adding the number of dwellings identified in:-

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

Number of Dwellings granted during the adopted Plan for Stafford Borough 2011-2031 as at 31st March 2019 totals as 1390 ie after 8 years against an allocation of 1,200⁵ over a 20 year period. This is 15% over allocation with 12 years still to run.

During the remaining 12 years of the current Local Plan there will also be additional consents for residential development granted within the Key Service Villages' development boundaries. This does not appear to have been mentioned or estimated in the Consultation Document.

⁵ (12% of 10,000 new dwellings in SPATIAL PRINCIPLE 4 (SP4) – STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION in the current Adopted Local Plan 2011 – 2031)

'Other Rural Areas'/'Rest of the Borough'/'Rest of Borough Area'

The Local Plan indicated that 'Other Rural Areas' were anticipated to provide 8% of the total housing provision of 10,000 Local Plan for (Spatial Principle 4).

Land for New Homes 2019 Figure 2 of Land for New Homes shows that from 2011 – 2019 'Rural Areas' comprised 9% of 4830 completions in Table 2 (434 completed dwellings).

Land for New Homes 2019 (Page 82) identifies a total of an additional 220 dwellings - all windfalls – with unimplemented planning permissions (this does not include the permissions that were completed 2011 – 2019).

Given the 12 years remaining it appears highly likely that the remaining allowance for 'Other Rural Areas' 2011 – 2031 of 146 new dwellings (800 – 434 – 220) will be exceeded

Notes:

- a. In the Local Plan 2011 – 2031 'Other Rural Areas' were anticipated to provide 8% of the total housing requirement of 10,000. This also appears to equate with 'Other Rural Areas' used in Land for New Homes.
- b. Figures for 'Other Rural Areas' used in Land for New Homes appears to equate with the description 'Rest of the Borough' which is used in the current consultation document.

Appendix C

Affordable Housing

It is considered laudable that Stafford Borough Council has a policy to 'Deliver 500 new homes including 210 affordable homes each year by working with developers and Registered Providers'. Under this policy 42% of new homes were to be affordable.

(The Council's published 'Housing Strategy 2015-2019
<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Policy%20and%20Plans/Housing-Strategy.pdf>)

In fact there were 3638 new homes completed in the 5 years to April 2019, of which 1065 were categorised as being 'affordable'.

The Plan for Stafford Borough 2011-2031 Authority Monitoring Report 2018-2019 - Tables 4.1 and 4.5.

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Misc/Authority%20Monitoring%20Report%202019%20FINAL.pdf>



Historic England

Midlands Team

Stafford Local Plan Review

Issues and Options consultation

FAO Local Plans Team Leader



Tuesday 21 April 2020

Dear Sir, Madam,

Re: Stafford Local Plan Review consultation, April 2020

Many thanks for consulting Historic England on the above consultation. We have the following comments to raise at this stage:

- Panel 5 on Page 9, we would hope to see a similar objective for the historic environment, as presented for the natural environment, namely the protection and enhancement of the historic environment, heritage assets and their setting.
- Paragraph 2.18 we would recommend amending 'historic' parks and gardens with 'registered' parks and gardens to reflect National Planning Policy Framework (NPPF) terminology. Do you have any additional detail that you could include? Examples of listed buildings and scheduled monuments, heritage tourism trails and attractions to set the scene of the rich historic environment of your area.
- Question 3 A; we would support a specific paragraph within the vision on the historic environment and how it can contribute to the Council's aspirations of a strong economy and social infrastructure. The current wording is set between paragraphs relating to the natural environment and as such the vision for this theme is lost.
- Question 3 F; we would welcome a specific objective for the historic environment and its opportunity to respond to an economic drive as well as responding to the needs of climate change. The retention and re-use of historic buildings is both a benefit for

heritage tourism and the challenges of climate change. We would seek the Plan to provide a positive strategy for the historic environment that is embedded into the Local Plan.

- Question 4 B; there will need to be appropriate consideration given to the requirements for renewable energy generation and the protection of heritage assets. For example, wind turbines in the setting of heritage assets or solar panels on listed buildings may be inappropriate and harm to the significance of heritage assets need to be considered. It will not be inappropriate in all cases but the Council will need to consider this issue and provide an evidence base for its policy direction.
- Question 4 D; if the Council adopts this approach we would welcome the opportunity to comment on the methodology for site/ area selection and to provide advice on the implications for the historic environment.
- Paragraph 5.1 we would welcome sight of the methodology the Council will be using to assess site allocations for the new Local Plan. Historic England would expect to see appropriate consideration of the significance of the historic environment, heritage assets and their setting, as part of this. I include a link below to Good Practice Advice Note 1 on preparing local plans and the historic environment and also HEAN 3: Site allocations and the historic environment, which set out key considerations to assist Councils in this process.

<https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

- Paragraph 5.34, Historic England have not made specific comments on the locations of development detailed in the Local Plan, as at this stage we are unable to undertake any site visits and at the time of writing this response, we have limited access to our GIS system. However, we are keen to ensure that any proposed site allocation, where there may be an impact for the historic environment, is accompanied by appropriate assessment of the impacts for the historic environment and avoidance/ mitigation and enhancement measures. The document highlighted above, HEAN 3, sets out advice on how this can be achieved and if you have any questions; Historic England is available to offer more detailed guidance.
- Paragraph 5.35, we would recommend inserting an additional bullet point here that sets out that allocations will also be subject to their impact on environmental considerations.

- Question 5M, any allocation of land for employment use should be subject to consideration of the impact for the historic environment and be accompanied by an appropriate evidence base. See above comments.
- Paragraph 6.1, clause 5, could relate to heritage tourism and reference the benefits the historic environment can bring to a local economy.
- Chapter 6/ Chapter 7 could both develop their reference to the historic environment through heritage tourism and town centre policy, by considering what opportunities there are brought about through heritage assets such as listed buildings, conservation areas.
- Question 8b, we would be supportive of new development reflecting the local distinctiveness and character of an area, utilising good design that respects its local environment and history (NPPF para 185).
- Question 9g, we would be supportive of a specific policy protecting and enhancing landscape character.
- Paragraph 9.33 onwards, we are supportive of a specific section on the historic environment and recommend that 'historic' parks and gardens is amended to 'registered' parks and gardens. We also note that in paragraph 9.36 it references 44 parks and gardens which we understand is a typographical error. We welcome the setting scene paragraphs and explanation of the vibrant historic environment in Stafford borough.
- Does the Council have a local list? Are the Conservation Area Appraisals and Management Plans adopted and up to date?
- We support the recognition in paragraph 9.37 about how the historic environment supports the local economy and consider that this could be developed elsewhere in the Plan.
- We welcome the bullet points in paragraph 9.38 and are keen to see how the Council will ensure that the Local Plan has a positive strategy for the historic environment.
- Question 9.I, Question 1. We recognise the intention to consider the impact on landscapes and the cross over between the natural and historic environment sector. We would be supportive of a policy that protects and enhances landscape and recognises both natural and historic features. However, we consider that it is essential that there is a specific policy in the Plan for the historic environment and the protection and enhancement of heritage assets (designated and non-designated) and their setting, in line with the NPPF.

- Question 2, we consider that a specific policy on the historic environment should consider both designated and non-designated heritage assets and should consider the historic environment holistically.
- Question 3, we are unclear as to what this question is referring to. We consider that any planning application should already have regard to the considerations set out within this question. For example, any application for a tall building should consider the existing building heights and the context of the local character in which new development is being applied for. If the Council is considering tall buildings in the borough of Stafford we would welcome a building heights policy informed by a tall building strategy that has considered all of the relevant issues in detail. For additional information we would recommend that you consider HEAN 4: Tall Buildings on Historic England's website, link below, which sets out how to consider new tall building development and the historic environment.

<https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>

We also have an updated version that is currently out for consultation but not yet adopted.

Historic England would also expect to be a consultee on any transport and infrastructure plans and would expect that the historic environment would be fully considered in any strategy.

- Question 4, again we are a little unclear as to what is meant by this question. The historic environment is an irreplaceable resource and once lost it cannot be recreated. We are always supportive of the retention and re-use of heritage assets and harm/loss should be wholly/exceptional in line with the NPPF. We consider that development proposals should consider the impact on the significance of the historic environment, heritage assets and their setting at the outset and conclude whether the proposed development is appropriate or not.
- Question 5, there is often competing aims between the protection of the historic environment and climate change adaptation and mitigation measures. We would welcome sight of any proposed policy for climate change and the historic environment and would be willing to offer guidance on how this could be appropriately developed.
- We support paragraph 9.40.
- Question 9.L we consider that any design policy should be informed by an understanding of what design currently exists through for example, urban and landscape characterisation studies, conservation area appraisals and management plans, an understanding of the significance of the historic environment and heritage assets and how new design could complement this in new development. We consider that the policy needs to be monitored and enforced so that locally distinctive, high quality design that responds to its context is delivered on the ground.

- Question 10.c, we consider any strategy for waste infrastructure in Stafford borough should consider the impact on the significance of the historic environment, heritage assets and their setting.
- Question 12 b, we consider any strategy for transport infrastructure in Stafford borough should consider the impact on the significance of the historic environment, heritage assets and their setting.
- Page 155, monitoring indicators for the historic environment, how are they working currently? What % change has there been in the number of heritage assets and those on the 'at risk' register?

Many thanks for the opportunity to comment at this stage. If you have any questions please ask. We are happy to receive informal consultations on site selection methodology and policy wording, if this would be helpful. We would welcome attending a meeting in the future, when we are able to.

Kind regards

Kezia

Kezia Taylerson

Historic Environment Planning Adviser

Midlands (North Team)

Yours sincerely

Stephen Stray
Spatial Policy and Delivery Manager
Economic Growth



Defence
Infrastructure
Organisation

Ministry of Defence

[Redacted]
[Redacted]
[Redacted]
[Redacted]

36

Telephone: [Redacted]
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Forward Planning
Stafford Borough Council
Civic Centre
Riverside
STAFFORD
ST16 3AQ

17 April 2020

Dear Sir or Madam

STAFFORD BOROUGH LOCAL PLAN 2020-2040: ISSUES AND OPTIONS CONSULTATION DOCUMENT FEBRUARY 2020

The Defence Infrastructure Organisation (DIO), on behalf of the Ministry of Defence (MOD), welcomes the opportunity to respond to the above consultation. The MOD has significant land interests within the Borough amounting to circa 400 hectares, including MOD Stafford (both the Main Site and several satellite sites) and Swynnerton Training Area. DIO has reviewed the consultation document and would like to make comments on the following sections of the plan.

Section 2 - A Spatial Portrait of Stafford Borough

Paragraph 2.21 - Towns and Rural Areas

The MOD supports the recognition of the presence of MOD within Stafford town. MOD Stafford is designated as a "Core" site, which means that it has a long-term, enduring future for Defence. In November 2016 the Government launched the Defence Estate Optimisation (DEO) programme, a long-term plan to modernise MOD facilities and invest in the defence estate to create a smaller, fit for purpose and more focussed estate. The DEO programme was mobilised in order to deliver the Footprint Strategy, which outlines how a 30% reduction in MOD built estate could be achieved by 2040, subject to available funding.

As part of the work being undertaken on the optimisation of the defence estate, MOD Stafford is designated as a "receiver site". Such a designation enables a site to be considered for better utilisation / efficiency (primarily to enable potential land release elsewhere on the estate), consolidation of assets, creation of centres of specialisation, and reduction of running costs.

MOD Stafford was referenced within the published "A Better Defence Estate" in November 2016 as part of the intended re-provision plan (subject to further assessment) for the disposal sites Parsons Barracks and Venning Barracks in Donnington. Additional work is now underway on an Assessment Study that will consider in more detail what part MOD Stafford could play in this re-provision.

Section 3 - Vision & Strategic Objectives

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

It is noted that the current Vision within the adopted Local Plan (2011-31) includes a specific reference to the MOD playing a part in achieving a strengthened and diverse economy in Stafford town. The MOD welcomes this and would like to see a similar recognition within the Vision for the new local plan.

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

The Key Objectives for Stafford within the adopted Local Plan (2011-31) include reference to the plan supporting the role of public sector organisations who have a significant presence in the town, including the Ministry of Defence. The MOD support this recognition and would like to see similar support within the new local plan, whether in the form of a new Key Objective, or contained within another section / policy within the plan.

Section 5 - The Development Strategy

Potential Garden Communities in Stafford Borough

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.*

The potential locations for Garden Communities / Major Urban Extensions in the Borough set out in the table in paragraph 5.34 and within Figure X on page 55 includes "Meecebrook" to the west of Yarnfield and north east of Eccleshall. The area encompassed by Meecebrook includes Swynnerton Training Area which is an existing and operational defence training area of circa 228 hectares.

A submission by DIO was made to Stafford Borough Council's Call for Sites consultation back in March 2018, putting forward Swynnerton Training Area as a site to be considered for potential redevelopment. Subsequently the site was included (along with additional land outside of MOD ownership) as part of "Meecebrook" within a submission to the Garden Communities programme. In March 2019 it was confirmed by the then Minister of State for Housing that Meecebrook had been successful in gaining funding from the Garden Communities programme in addition to four other sites in England.

At present Swynnerton Training Area remains an operational defence site. However, the MOD recognises the opportunity that Meecebrook represents and is in the process of undertaking work to consider the future of the Swynnerton site. Should this work conclude that the existing training activities taking place at Swynnerton Training Area could be relocated to another site, and a suitable re-provision plan put in place, freeing up the Swynnerton site for disposal, then MOD would be supportive of the Meecebrook option as a new settlement within the local plan. The Meecebrook option provides the opportunity to create a new, sustainable, autonomous settlement which could take pressure off the requirement for further significant development at Stafford, Stone or other existing settlements within the Borough.

Methodology for selection of Settlement Boundaries and potential site options - Paragraph 5.81

As part of any review of settlement boundaries that the Council might take as part of the local plan review, the MOD would like to see land at MOD Stafford remain within the settlement boundary for Stafford.

Question 5.1 *Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan? Please explain your answer.*

The MOD would have potential concerns over any growth option which would see significant further development around the north-eastern extent of Stafford as this, on top of the delivery of the Strategic Urban Extension to the north of Stafford, could potentially impact adversely on MOD Stafford. It is recognised therefore that the option of at least one Garden Community could reduce the pressure on further urban extensions at Stafford.

Section 6 - Delivering Economic Prosperity

This section focusses on uses falling within Class B of the Use Classes order. However, there are other uses which have a positive impact on the local economy, such as Defence. The MOD would like to see recognition of, and support for, Defence related development within the new local plan. This would accord with paragraph 95 of the National Planning Policy Framework, which states:

"Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: .. b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area."

Section 9 - Delivering Quality Development

Protecting and Enhancing Tree Cover - Paragraph 9.25

The MOD recognises and supports in principle the Council's ambition to maintain and enhance tree cover within the Borough. However, any policy relating to this topic within the local plan should not be too onerous or place undue burden on development, particularly that which is only small in scale. Therefore, the MOD has concerns over the potential blanket protection of all of the tree stock which

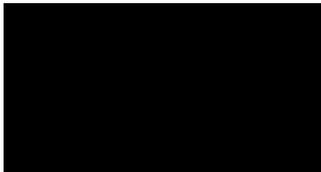
paragraph 9.25 a) appears to imply. Similarly, requiring "*any and all development*" to contribute towards a tree cover scheme would require careful consideration to ensure that such requirements are appropriate to and proportionate to the development being considered.

Design - Paragraphs 9.39-9.40

The MOD recognises a need for good design within the planning system, however due to the nature of defence buildings, operational and technical requirements may sometimes reduce the opportunity to be flexible with the design of development. As part of any design related policies that are brought forward through the local plan review, the MOD would like to see such policies have a degree of flexibility to take into account such cases.

Should you need further information or clarification on any of the points raised above, please do not hesitate to contact me.

Yours sincerely



Jodie McCabe BSc (Hons) MA MRTPI
Senior Town Planner, Estates

**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	Hazel	
Surname	McDowall	
E-mail address	[REDACTED]	
Job title (if applicable)	Lead Adviser	
Organisation (if applicable)	Natural England	
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 21 April 2020.**

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

Please note:

- Comments must be received by 12noon on Tuesday 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.

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name	Hazel McDowall		Organisation Natural England		
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Whole document	Paragraph		Table	
Figure		Question	General Comments	Other	
2. Please set out your comments below					
<p>Thank you for your consultation on Stafford Borough New Local Plan Issues and Options 2020-2040 received by Natural England.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Stafford Borough Council and other cross boundary partners share an ambition in the Midlands Heathland Heartland (Cannock Chase to Sutton Park) area to:</p> <ul style="list-style-type: none"> • Use a partnership approach to better manage, protect, expand and enhance lowland heathland and associated habitats to improve biodiversity. • Link and buffer these sites and also create a network of further complementary habitats. • Facilitate integrated sustainable public access and education to increase the value that people put on local biodiversity and the landscape <p>This is reflected in your Local Plan’s ambitions to deliver the Government’s 25 Year Environment Plan to work with other Local Authorities and Duty to Co-operate Authorities to create ecological links, networks and green corridors for nature and people to enjoy.</p> <p>We welcome the opportunity to comment on your New Local Plan – Issues and Options and set out our answers to your questions below.</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Vision	Paragraph	3.3 Last paragraph	Table	
Figure		Question		Other	Page 26

2. Please set out your comments below

There is a typo in paragraph 3.3, 'Area of Conservation (SAC)' should read as '**Special** Areas of Conservation' – Adding the word Special and s for plural as more than one in Stafford Borough.

Natural England suggests the following wording for this sentence, 'Sites protected under the Birds and Habitats Directives, Cannock Chase Area of Outstanding Natural Beauty (AONB) and the Green Belt areas within Stafford Borough will have benefited...'

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

Section	Vision	Paragraph		Table	
Figure		Question	3a, 3b and 3c	Other	

2. Please set out your comments below

Natural England agree that the vision should change and it should be shorter. On reading the vision it is long and confusing with a lot of replication for each of the geographical areas. This could easily be streamlined by not separating out into geographical areas.

The bullet points (a to x) don't really inspire, they define the how...how the vision will be delivered e.g. reduce the need to travel.

Natural England advises that the Plan's vision should strengthen references to the natural environment. This includes recognising the need to respond to climate change and its consequences. It should set out the environmental ambition for the whole plan area. The plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity and considering opportunities to enhance and improve ecological connectivity.

This is supported by the background evidence in the Habitats Regulation's Assessment (HRA) – Issues and Options (January 2020) Report which supports a stronger environmental vision paragraphs 3.18 to 3.20 on page 24.

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

Section	Objectives	Paragraph		Table	
Figure		Question	3D, 3E and 3F	Other	

2. Please set out your comments below

The spatially based approach does lead to duplication. As set out in our answer to other parts of question 3, Natural England recommends the objectives/themes should clearly aim to protect and enhance the natural environment, providing net gain for biodiversity, considering opportunities to enhance and improve ecological connectivity, green infrastructure and respond to the challenges of climate change.

As supported in the Habitats Regulation's Assessment – Issues and Options (January 2020) Report

paragraph 3.21 on page 25, the objectives should deliver multiple benefits of the natural environment for health, economic and social wellbeing.

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

Section	Sustainability and Climate Change	Paragraph		Table	
Figure		Question	4 A.b	Other	

2. Please set out your comments below

Natural England supports the example given of tree planting to moderate heat island effects. It is positive that the Local Plan considers climate change adaptation and recognises the role of the natural environment to deliver measures to reduce the effects of climate change.

In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment’s resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.

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

Section	Sustainability and Climate Change	Paragraph		Table	
Figure		Question	4B, 4D and 4E	Other	

2. Please set out your comments below

Natural England advises that any strategy for renewable energy technologies, including wind energy developments, should take full account of the capacity of the natural environment to accommodate the energy infrastructure. When siting renewable energy technologies they should avoid adverse impacts on designated sites and landscapes. This should include cumulative landscape and visual impacts.

Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 170 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 155-165 of the NPPF.

The Local Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.

Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.

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

Section	The Development Strategy	Paragraph		Table	
Figure		Question		Other	Chapter 5 – general comment

2. Please set out your comments below

Natural England expects sufficient evidence to be provided, through the Sustainability Appraisal (SA) and Habitat Regulation Assessment (HRA), to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

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

Section	Chapter 6 Delivering Economic Prosperity	Paragraph		Table	
Figure		Question		Other	Chapter 6 – General comment

2. Please set out your comments below

As set out in our comments to Chapter 5, Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process for employment land and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes

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

Section	Chapter 6 Visitor Economy	Paragraph	6.25	Table	
Figure		Question	6L	Other	

2. Please set out your comments below

Natural England supports the reference set out in the Habitats Regulation’s Assessment – Issues and Options (January 2020) Report paragraph 3.33 page 29, as below...

This chapter also includes reference to the visitor economy and whether policies need to be updated and refined to better cover this aspect of the economy for the Borough. Where policies specifically promote tourism that has the potential to lead to increased pressure on European sites this will need to be assessed.

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

Section	Green Blue Infrastructure	Paragraph		Table	
Figure		Question	9A	Other	Page 117

2. Please set out your comments below

Natural England advises that the plan may include a specific Green Infrastructure policy or Green Infrastructure may be integrated into other policies. A Green Infrastructure policy should support other policies e.g. biodiversity (green space, flood risk, climate change adaptation).

Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by a Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively clearly integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

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

Section	9 Natural Environment	Paragraph		Table	
Figure		Question	9B	Other	Page 120

2. Please set out your comments below

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity building on the evidence base document Stafford Borough Nature Recovery Network Report.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined above). Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para 170 of the NPPF. The Plan should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. The National Planning Policy Framework (NPPF) highlights the role of *'policies and decision making to minimise impacts and provide net gains for biodiversity'* (para 170)

Planning Practice Guidance describes net gain as an *'approach to development that leaves the natural environment in a measurably better state than it was beforehand'* and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, the Biodiversity Metric 2.0, can be used to measure gains and losses to biodiversity resulting from development. We advise you to use this metric to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

The Chartered Institute of Ecology and Environmental Management, along with partners, has developed 'good practice principles' for biodiversity net gain, which can assist plan-making authorities in gathering evidence and developing policy.

The following may also be useful considerations in developing plan policies:

- Use of a biodiversity net gain target. Any target should be achievable and evidence based and may be best placed in lower tier documents or a Supplementary Planning Document, to allow for regular updates in line with policy and legislation.
- Consideration should be given to thresholds for different development types, locations or scales of development proposals and the justification for this. Setting out the scope and scale of expected biodiversity net gains within Infrastructure Delivery Plans can help net gain to be factored into viability appraisals and land values. Natural England considers that all development, even small scale proposals, can make a contribution to biodiversity. Your authority may wish to refer to Technical Note 2 of the CIEEM guide which provide useful advice on how to incorporate biodiversity net gain into small scale developments.
- Policy should set out how biodiversity net gain will be delivered and managed and the priorities for habitat creation or enhancement in different parts of the plan area. The plan policy should set out the approach to onsite and offsite delivery. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets

wider biodiversity objectives set in the development plan. Further detail could be set out in a supplementary planning document.

- The policy could also usefully link to any complementary strategies or objectives in the plan, such as green infrastructure.

Natural England focusses our advice on embedding biodiversity net gain in development plans, since the approach is better developed than for wider environmental gains. However your authority should consider the requirements of the NPPF (paragraph 72, 102, 118 and 170) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space of biodiversity strategies. Opportunities for environmental gains, including nature based solutions to help adapt to climate change, might include.

- Identifying opportunities for new multi-functional green and blue infrastructure.
- Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) and climate resilient
- Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape.
- Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending the network to create missing footpath or cycleway links.
- Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore)
- Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habitats.

Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.

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

Section	9 Natural Environment	Paragraph		Table	
Figure		Question	9C	Other	

2. Please set out your comments below

Natural England strongly supports:

- a) the continuation of protecting designated sites from development, including a buffer zone as appropriate;
- b) a strategic approach to encouraging the biodiversity enhancement of development sites, using the Stafford Borough Council Nature Recovery Network Report
- c) Increased monitoring of biodiversity mitigation and enhancement measures on development sites.

See also our comments on biodiversity net gain that also apply here (question 9 B). There should also be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	9 Natural Environment	Paragraph		Table	
Figure		Question	9D	Other	
2. Please set out your comments below					
<p>Plan policies should have regard to the Cannock Chase AONB Management Plan 2019-2024 and the Cannock Chase AONB Design Guidance by:</p> <ul style="list-style-type: none"> • Providing the highest levels of policy protection for the landscape and scenic beauty of the AONB (including its wider purposes of landscape, natural beauty, understanding and enjoyment and cultural heritage) whilst having regard for economic and social well-being. • Encouraging the enhancement of Cannock Chase AONB • Setting out a clear criteria for appropriate development within or impacting on Cannock Chase AONB, including the major developments test for major development within the AONB • Reflecting AONB Management Plan objectives • Developing appropriate policies to manage the nature, scale and location of development in Cannock Chase AONB and, where appropriate, its setting. • Encouraging the highest standards of design for development outlined above. <p>Natural England wants to see the character of Cannock Chase conserved and enhanced (both direct and indirect pressures can impact on character).</p> <p>We want to ensure that proposed developments close to the boundaries of Cannock Chase AONB and within its setting) takes proper account of their impact on the AONB. (Note: whilst there is no reference to settings in the NPPF, the PPG on Landscape (para 3) notes that the duty on public bodies to have regard to the purpose of AONBs is relevant in considering development in their setting).</p>					

1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?					
Section	Section 9 – Natural Environment	Paragraph		Table	
Figure		Question	9E	Other	
2. Please set out your comments below					

Natural England welcomes the approach to providing a specific policy to maintain and enhance tree cover in the area. In particular, we would welcome a policy to protect ancient woodland, aged and veteran trees. As set out in the NPPF when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles...

planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Natural England recommends using the evidence base in the Stafford Borough Council Nature Recovery Network Report, along with the Draft Staffordshire Landscape Character Assessment 2015, to ensure that the right tree gets planted in the right place.

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

Section	Section 9 – Natural Environment	Paragraph		Table	
Figure		Question	9F	Other	

2. Please set out your comments below

Natural England is supportive of the Council developing a policy that requires new developments taking an active role in securing new food growing spaces. This policy would support a strategic approach to Green Infrastructure. As we refer to in question 9A, ‘Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, **food production**, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, **allotments**, cemeteries, woodlands, rivers and wetlands’.

We would also like to see the plan safeguard the long term capability of the best and most versatile agricultural land. The plan should make clear that areas of lower quality agricultural land should be used for development in preference to best and most versatile land.

The plan should recognise that development (soil sealing) has an irreversible adverse (cumulative) impact on the finite national and local stock of BMV land. Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land.

For more information, see [PPG on Soils and agricultural land](#).

Alongside this we draw attention to Soil, a finite resource, fulfilling many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably.

The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process.

Soils of high environmental value (e.g. wetland and carbon stores such as peatland) should also be considered as part of ecological connectivity.

We should advise that Plan policies refer to the [Defra Code of practice for the sustainable use of soils on construction sites](#).

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

Section	Section 9 - Natural Environment	Paragraph		Table	
Figure		Question	9G	Other	

2. Please set out your comments below

Yes, Natural England would like to see specific policies requiring new developments to minimise and mitigate the visual impacts that it has on the Character Areas and quality of its landscape setting. We would like to see visual impacts include light pollution and for noise pollution also to be included.

Light pollution has negative impacts on local amenity, intrinsically dark landscapes and nature conservation (especially bats and invertebrates). Light pollution mapping is available from [CPRE](#).

The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 100 and 180 of the NPPF. Tranquillity is an important landscape attribute in certain areas e.g. within the AONB, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity which are available [here](#) and are a helpful source of evidence for the Local Plan and SEA/SA.

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

Section	Section 9 – Natural Environment	Paragraph		Table	
Figure		Question	9L	Other	

2. Please set out your comments below

Natural England supports a, b and c being in the new Local Plan. They would support high quality design and the role of the natural environment in delivering local distinctiveness and sense of place. C in particular would enable clear references to biodiversity, landscape, green infrastructure (including greenspace), sustainable drainage, climate change adaptation, soils.

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

Section	Section 9- Natural Environment	Paragraph		Table	
Figure		Question	9N	Other	

2. Please set out your comments below

For information Natural England is, working with Defra, to revise the ANGST standards and develop Green Infrastructure Standards.

There are essentially 3 parts to the work –

1. Letting a contract to develop a benchmark for Green Infrastructure Standards – looking to revise ANGST and distances to greenspace / urban greening factor (formula)
2. National ANGST Map mapping Project – downloadable to LPAs in order to insert data
3. Preparation and release of Defra / NE Design Guidance for Green Infrastructure

Natural England will keep Stafford Borough Council informed as this work progresses.

The plan should also consider the value of local Rights of Way to health and wellbeing, access to nature and the countryside, delivering modal shift and reducing CO2 and from an economic (tourism) development perspective. The network may also be important in terms of Green Infrastructure. It should include quality of routes as well as their mere existence.

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

Section	Section 10 – Environmental Quality	Paragraph		Table	
Figure		Question	10 B	Other	

2. Please set out your comments below

Natural England welcomes this question and the attention given to this important issue. Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from *local impacts* are those within 200m of a road with increased traffic¹, which feature habitats that are vulnerable to nitrogen deposition/acidification. [APIS](#) provides a searchable database and **information on pollutants and their impacts on habitats and species.**

¹ The ecological effects of diffuse air pollution (2004) English Nature Research Report 580
Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency

A Strategic Nitrogen Action Plan (SNAP) is in the early phases of development. Natural England will continue to work with the local planning authorities in the Cannock Chase SAC partnership to collate an evidence base to determine a strategic solution.

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

Section	Section 11 – Health and Wellbeing	Paragraph		Table	
Figure		Question	11 A	Other	

2. Please set out your comments below

Natural England would welcome stronger references to Health and Wellbeing being made throughout the plan and in particular, the Natural Environment chapter, helping to articulate the multiple benefits and key services the natural environment delivers. Our natural environment delivers many key services that are important for health and wellbeing e.g. Open spaces, rights of way, tranquillity etc.

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

Section	Section 12 – Connections	Paragraph		Table	
Figure		Question		Other	

2. Please set out your comments below

The transport policies should take full account of the impacts on the natural environment through the SA and HRA process. Links could be made with policies on Green Infrastructure and ecological networks (contribution of highway verges and railway embankments).

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

Section	14- Monitoring and Review	Paragraph		Table	
Figure		Question	14 A	Other	

2. Please set out your comments below

As highlighted in the HRA supporting evidence document, monitoring positive change for the natural environment, would be useful.

Your plan should include requirements to monitor biodiversity net gain. This should include indicators to demonstrate the amount and type of gain provided through development. The indicators should be as specific as possible to help build an evidence base to take forward for future reviews of the plan, for example the total number and type of biodiversity units created, the number of developments achieving biodiversity net gains and a record of on-site and off-site contributions.

We recommend working with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. This will be particularly important for strategic housing allocations and providing as much up front information on monitoring will help to streamline the project stage.

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

Section	Sustainability Appraisal	Paragraph		Table	
Figure		Question		Other	

2. Please set out your comments below

Paragraph 32 of the National Planning Policy Framework outlines that the Sustainability Appraisal (SA) should inform plan making and should demonstrate how relevant economic, social and environment objectives have been addressed, including opportunities for net gains. We support the commitment in the interim SA of this Local Plan to deliver biodiversity net gain, which can then be tested as the plan develops.

SA monitoring indicators could include specific reference to the biodiversity losses and gains, to be measured using the metric, and to record how the policy is delivered.

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

Section	Habitat Regulations Assessment – Issues and Options, January 2020	Paragraph		Table	
Figure		Question		Other	

2. Please set out your comments below

Natural England have no further comments to make on the Habitat Regulations Assessment Report.

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 21 April 2020.**

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

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

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

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

NEW LOCAL PLAN 2020-2040: ISSUES & OPTIONS

STAFFORD BOROUGH COUNCIL – PRIVACY NOTICE

How we will use your details

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

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

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

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

Stafford Borough Council are the data controller and you can find information about how we handle your personal data by visiting www.staffordbc.gov.uk/privacynotices and if you have

any queries or would like to unsubscribe from receiving information then please contact forwardplanningconsultations@staffordbc.gov.uk

**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	Mike	
Surname	Shurmer	
E-mail address	[REDACTED]	
Job title (if applicable)	Senior Conservation Officer – West Midlands	
Organisation (if applicable)	The Royal Society for the Protection of Birds (RSPB)	
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: Mike Shurmer		Organisation: RSPB		
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	1B	Other
2. Please set out your comments below				
<p>Evidence to support the plan should include that which allows the identification and mapping of components of ecological networks, as referred to in paragraph 174 of the National Planning Policy Framework (NPPF). As such, we support the use of the Stafford Borough Nature Recovery Network report, as list in the Evidence.</p> <p>We would note that further survey work is required to complete and update the identification of the ecological network evidence base, such as ancient woodland and Local Wildlife Sites.</p>				

Section		Paragraph		Table
Figure		Question	3C	Other
2. Please set out your comments below				
<p>Whilst we would agree that a new vision must recognise the importance of climate change and its consequences, this should be explicit in the Plan taking a proactive approach to mitigating and adapting to climate change (rather than just responding to the consequences). See paragraph 149 of the NPPF. This is clearly reflected elsewhere in the Plan, but needs to be consistent throughout.</p> <p>We would also highlight that any changes to the vision need to reflect the role of the planning system in tackling both the climate AND nature emergency (for example, only climate change is mentioned in Figure 3.1). The current vision can be strengthened to promote the conservation of priority sites, habitats and species, and ecological networks. This would reflect the 25-year Environment Plan targets for growing and resilient ecological networks, richer in wildlife, and the requirements of the NPPF (eg paragraph 174).</p>				

Section	3	Paragraph	9	Table
Figure		Question	3F	Other
2. Please set out your comments below				

The objectives listed could give greater clarity to the need for a healthy natural environment so that local communities to have access to high quality natural spaces, promoting health and wellbeing (as recommended in the 25-year Environment Plan).

Objective 3 need to be expanded to additionally avoid significant adverse impacts on the nationally important populations of Annex 1 birds within Cannock Chase AONB, including on land outside of the SAC boundary. The SAC is not the only nature conservation feature of the AONB, and Stafford Borough, subject to the requirements of European law. Under Article 4(4) of the EC Birds Directive, there is a requirement to “strive to avoid the pollution or deterioration of habitats” of Annex 1 bird species; even those outside designated Special Protection Areas.

Objective 26 could better reflect that a landscape-scale approach to making wildlife sites “More, Bigger, Better and Joined” in , as outlined in the “Making Space for Nature” report by Sir John Lawton, is fundamental to an effective green infrastructure network in Stafford Borough, to protect and enhance designated sites, priority habitats and populations of priority species.

Section	4	Paragraph		Table	
Figure		Question	4A	Other	

2. Please set out your comments below

Section 4 on sustainability makes no mention of biodiversity. In addition to a climate emergency, we also have a nature emergency and the Plan would benefit from greater clarity by outlining a more holistic approach to sustainability.

The Plan should contain policies that require biodiversity to be designed into the built environment. This could be outlined in a Supplementary Planning Document, referred back to Local Plan policy. The SPD should detail good practice approaches to protecting and enhancing biodiversity value within the built fabric and wider landscape of residential development.

Principles of design for urban wildlife and green infrastructure to incorporate nature-friendly elements into the build environment, such as a significant percentage of wildlife-friendly greenspace within development, bat and bird boxes, swift bricks, roof gardens and living walls all provide essential wildlife habitat within developments.

For information on a progressive approach to sustainable and wildlife friendly housing, see information on Barratt Homes’ Kingsbrook development.

<https://www.rspb.org.uk/our-work/conservation/projects/kingsbrook-housing/>

Section	4 & 9	Paragraph		Table	
Figure		Question		Other	

2. Please set out your comments below

This comment cover both section 4 on sustainability and 9 on delivering quality development.

The Plan should deliver multi-functional Sustainable Drainage Schemes, with emphasis on source control features. This includes biodiverse roofs, green walls, permeable hard surfaces, rain gardens and kerbside bioretention/rain garden beds and filter strips.

This is currently not clear within the paper, but with reference to question 9A, there should be specific policies on blue and green infrastructure, which should ensure that these principles are followed.

The RSPB has worked with others to produce guidance on maximising the potential of Sustainable Drainage Systems for people and wildlife.

http://ww2.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf

Section		Paragraph		Table	
Figure		Question	8A	Other	
2. Please set out your comments below					
<p>Whilst the RSPB recognises that redeveloping brownfield land can provide opportunities which reduce pressure elsewhere, some brownfield sites are havens for wildlife and support some of the UK's most scarce and threatened species. In some cases, brownfield sites provide important 'wild spaces' for local communities, providing access to nature and improving health and wellbeing. Brownfield sites can also be vital components of ecological networks.</p> <p>An additional point (for example at 8.8) should be included to reflect that where brownfield sites are prioritised for development, this must ensure that the most important brownfield sites for urban diversity are identified through up-to-date ecological survey and assessment of all such sites.</p>					

Section		Paragraph		Table	
Figure		Question	9A	Other	
2. Please set out your comments below					
<p>We would support recommendations for a Green Infrastructure strategy that protects and enhances green spaces and improves the management and/or targeting of priority habitats and species. This strategy should be adequately reflected within the Local Plan.</p>					

Section		Paragraph		Table	
Figure		Question	9B	Other	
2. Please set out your comments below					

The Plan should contain policies that:

- Are specific about the types of actions required to establish and/or strengthen ecological networks, i.e where habitats need to be restored/created and core areas and wildlife sites joined, defining these spatially.
- Protect, enhance and buffer components of the ecological networks (eg through planning restrictions).
- Protect and improve conditions of locally important sites, such as local wildlife sites and local nature reserves, focusing on those sites that play an important role in the wider ecological network.
- There should be a strategic policy that specifically highlights to important of creating and strengthening ecological networks to meet targets in the 25-year Environment Plan.

Section		Paragraph		Table	
Figure		Question	9C	Other	
2. Please set out your comments below					
<p>It is imperative that the Local Plan protects designated sites from development, along with other important sites for nature and nationally important populations of wildlife species. The Local Plan should give the highest level of protection to sites of international nature conservation importance (SACs and Ramsar sites). There should also be high priority to reducing impacts on designated sites by reducing impacts from surrounding areas (eg upstream in river catchments).</p> <p>We would support improved long-term monitoring of appropriate biodiversity mitigation and enhancement measures on development sites.</p>					

Section	9	Paragraph	17	Table	
Figure		Question	9 D	Other	
2. Please set out your comments below					
<p>Plan policies should recognise that the SAC is not the only nature conservation feature of Cannock Chase AONB subject to the requirements of European law. Under Article 4(4) of the EC Birds Directive, there is a requirement to “strive to avoid the pollution or deterioration of habitats” of Annex 1 bird species; even those outside designated Special Protection Areas.</p> <p>Therefore, policies should additionally mention that Cannock Chase AONB holds nationally important populations of Annex 1 birds, as a further feature subject to the requirements of European law.</p> <p>Plan policies should reflect the AONB Management Plan policy WN9 and associated action A13, to support opportunities to build connected networks of wildlife sites extending beyond the AONB boundary and improve landscape permeability to enhance the resilience and viability of wildlife populations concentrated within the AONB.</p>					

Section		Paragraph		Table	
Figure		Question	9E	Other	

2. Please set out your comments below

We would recommend at additional point in this section to emphasise that tree planting needs to be done strategically and based on evidence, under the principle of 'right tree, right place'. Where tree planting is planned, appropriate species must be used, with a focus on a diversity of native tree species, this should sit within and complement the wider ecological networks and existing native woodland resource should be protected and enhanced. It is also important to recognise that alongside tree planting, natural regeneration and non-wooded habitats also offer carbon storage (along with other benefits).

Tree planting is not always appropriate, for example this can have a detrimental impact on some of the priority open habitats found within Stafford Borough. Reference to the Stafford Borough Nature Recovery Network Mapping report outlines opportunities to enhance networks of open lowland heathland and grassland habitats in Stafford Borough, which provide habitats for characteristic wildlife species of conservation importance. Tree planting would not be appropriate on some of these sites, and native broadleaved woodland may not be the most suitable restoration habitat to target in these locations.

We would agree that trees are valuable components of rural and urban landscapes, providing a range of benefits, and that tree planting can be an effective nature-based solution. There are many opportunities within Stafford Borough to improve the health of natural spaces, wildlife and resilience through tree planting, striving to contribute to targets within the 25-year Environment Plan.

Section	Paragraph	Table
Figure	Question	Other

2. Please set out your comments below

There are opportunities to strengthen the references to health and wellbeing in relation to the natural environment (particularly Section 9). Preserving, protecting and improving the natural environment near people's homes and in the wider countryside, and creating new greenspace, will provide health and wellbeing benefits and reduce social inequalities in the local communities it supports.

This would correspond to the 25-year Environment Plan target for "making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing.

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

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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
Your Details		
Title	Ms	
First Name	Kate	
Surname	Dewey	
E-mail address	[REDACTED]	
Job title (if applicable)	Senior Planning Officer	
Organisation (if applicable)	Staffordshire Wildlife Trust	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone Number	[REDACTED]	

Part B: Your Comments			
<i>Please complete a new Part B for each representation you wish to make.</i>			
1. Which part of the New Local Plan 2020-2040 “Issues and Options” consultation paper does this representation relate to?			
Section	Section 1 – Introduction	Question	1.A. Is the evidence that is being gathered a suitable and complete list?

We do not feel the evidence base is complete- see below.

Section	Section 1 – Introduction	Question	1.B. Have any key pieces of evidence necessary for Stafford Borough’s new Local Plan been omitted?
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Stafford Borough Nature Recovery Network (NRN) mapping

The report provides a good baseline to inform strategic policy; mapping out key corridors, important habitats and highlighting threats and opportunities for nature. However it does not appear to have been used to inform the sustainability appraisal, or assessment of spatial options or strategic development site options. These assessments should draw on evidence in the NRN mapping in the first instance.

Further specific evidence gathering may be needed at later stages of the plan process, in certain locations, in order to further inform planning application decisions, as well as assessment of habitat value within biodiversity offsetting. This could be carried out to inform the preferred options assessments, and be achieved through ongoing work as recommended in the report, and through the Biodiversity and Development SPD and proposed Biodiversity Offsetting Strategy.

Ecological Evidence Base

Although known designated sites and important habitats have been mapped within the evidence base, the inventories are not comprehensive and require ongoing work to keep them up to date. Additional priority habitats and LWS are identified every year, while studies for HS2 have revealed several newly registered ancient woodlands along the proposed route within the borough. It is highly likely there are further ancient woodlands, veteran trees, priority habitats and sites worthy of LWS status still to be identified within the borough. Further evidence is also needed with regard to the biodiversity and geodiversity value of previously developed land and the opportunities for incorporating this in developments.

In order to comply with the requirements of the NPPF and planning practice guidance to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, a continued commitment to ongoing survey and assessment is needed, to fill gaps in the current data and keep existing site data up-to-date. Further detailed mapping is needed at the site or settlement level to identify smaller corridors, constraints and opportunities as set out in the indicators used to assess the potential site allocations.

Priority should firstly be given to areas around settlements where development pressure may threaten, or be constrained by, important habitats. This would strengthen the evidence base, allow more accurate biodiversity offsetting, and provide information in advance of planning applications to avoid issues and maximise opportunities for gain.

Restoring and protecting peatlands is a key policy within the 25 Year Environment Plan, due to their important role in carbon sequestration, flood management and biodiversity. Stafford Borough contains some large areas of peat soils, and several peatland habitat sites, although not all areas have been identified or designated, and several areas are thought to be degraded. These wetlands need special consideration in terms of their catchments, as the core habitat is reliant on a well-managed area around it where water supplies and nutrient inputs are as natural as possible. Identifying, protecting and restoring such sites would contribute to climate change mitigation, as well as flood management and enhancing priority habitats. We recommend the LPA identify, and facilitate designation where appropriate, of all un-designated peatland habitats in the borough.

Increasing woodland cover is another key aim within the 25 Year Environment Plan, and also an aspiration within the new Local Plan. An accurate evidence base for woodland and tree cover in the borough will be necessary for forming targets, identifying creation opportunities and monitoring progress.

Green Space and Access to Nature

A Green Space Audit should be carried out, particularly including an Accessible Natural Greenspace study, as per Natural England ANGSt standards guidance. Evidence for the need for new burial sites and allotment sites is also required.

The current Covid-19 situation has highlighted the importance of local greenspaces within walking/cycling distance, and the desire of the public to visit natural places as well as formal parks. There is a need to identify areas where there is a deficit, particularly near more deprived areas and where accommodation does not have gardens e.g. flats.

The access network- cycle network, canals, bridleways and footpaths are all potential green corridors as well as public access. Adequate data on the condition and shortfalls/ gaps in provision would help inform green infrastructure needs.

Green Infrastructure Strategy

A Green Infrastructure Strategy, bringing together biodiversity, blue infrastructure and other aspects of ecosystem services, would enable more site and settlement-specific needs to be identified, and projects to be formulated for infrastructure delivery. This would help inform site selection and allocation, as well as planning application decisions and securing of CIL/ s106 and wider partnership funding. Such a study is also recommended by the Strategic Development Site Options study.

Interim Sustainability Appraisal Report

The appraisal has not used the evidence within the NRN mapping to inform the biodiversity assessment. This may well be due to the timing of the production of these documents, however the incomplete evidence should be acknowledged and indications made in terms of ongoing updating. The appraisal should use the threats and opportunities identified in the NRN report to assess the opportunities that would be lost or enhanced through the various growth scenarios. Development locations and growth patterns can either block, or enable ecological corridors and enhancement areas, and the bottle-neck analysis laid out within the NRN mapping can identify this. The appraisal should also consider how the scenarios specifically relate to supporting habitats around key designated sites.

Assessment of the biodiversity objective has focussed mainly on statutory designated sites and ancient woodland, with incomplete consideration of Local Wildlife Sites, priority habitats or important species. This is illustrated by the uncertainty regarding significant effects, and particularly the conclusion that option E. at Meecebrook is ranked first for biodiversity, with 'No notable biodiversity constraints identified'. In fact there are Local Wildlife Sites within the site, and potential for significant areas of priority habitat to be present. This raises concerns that site sifting may disregard or choose sites without adequate information.

As well as utilising information within the NRN mapping report, further site-specific evidence should be gathered at the appropriate stage of the local plan process, to fully assess the impacts and benefits of each option.

The Sustainability Appraisal is currently not sufficient and needs to be revised to include all available biodiversity information before the preferred options assessment is carried out.

Habitats Regulations Assessment

We support the conclusions presented in HRA around the need to enhance supporting habitats around key designated sites. The assessment should also use the NRN mapping to evaluate how each growth scenario could impact or enhance designated sites.

Economic and Housing Development Needs Assessment

Please see attached appendices 1 and A which deal with this topic.

Strategic Development Site Options study

We are concerned that the assessment criteria for assessing site suitability and constraints have not included all the necessary evidence base elements that the NPPF requires.

The NPPF states:

171. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁵³; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Under Environmental Constraints, paragraph of the study states:

1.18 Assessing environmental considerations, including impact on internationally protected ecological sites¹, national local wildlife sites² and other local wildlife or ecological designations³

However, locally designated sites have **not** been used in the assessment criteria; only statutorily designated sites and ancient woodland appear to have been considered. Veteran trees also do not seem to have been included. It should also be born in mind that the ancient woodland inventory, ancient tree inventory and the Local Wildlife Sites evidence base are not complete or comprehensive, and should be treated as provisional. Many ancient woodlands under 2 hectares are not yet registered, and new LWS are discovered every year. Therefore there are likely to be high-value habitats within/ adjacent the site options that have yet to be identified.

LPAs should allocate land with the least environmental or amenity value- therefore the environmental value of sites should be established to inform decision making. As well as designated sites and irreplaceable habitats, the planning practice guidance lists several other aspects to be identified, including: priority habitats and species, wildlife corridors and stepping stones, and areas identified by partnerships for habitat enhancement or creation. These are not included in the assessment. It should also be born in mind that available data on priority habitats is not complete, and data from Natural England is quite out of date and incomplete.

Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or

landscape scale across local authority boundaries. However, the assessment criteria do not seem to have taken account of the Nature Recovery Network mapping report, as no opportunities for habitats or green infrastructure are mentioned in the Site Assessments or Potential Infrastructure Requirements for each site.

The Assessment Proformas for each site option, presented in Appendix A, do list many of these considerations in the indicators of suitability:

- *Green Infrastructure Corridor*
- *Local Wildlife Site (LWS)*
- *Public Open Space*
- *Nature Improvement Area*
- *Regionally Important Geological Site*

For these indicators, all the sites have 'Unknown' in the assessment. This information is readily available within the NRN mapping report, as well as in datasets available from Staffordshire Ecological Record, and should have been used.

The following indicators are also listed:

Site contains habitats with the potential to support priority species?

Does the site contain local wildlife-rich habitats?

Is the site part of:

- *UK BAP Priority Habitat;*
- *a wider ecological network (including the hierarchy of international, national and locally designated sites of importance for biodiversity);*
- *wildlife corridors (and stepping stones that connect them); and/or*
- *an area identified by national and local partnerships for habitat management, enhancement, restoration or creation?*

The list should also include protected species as an indicator. In the assessments, no site has complete entries against these indicators. There is some very cursory information on priority habitats gained from MAGIC map (which itself is incomplete), and comments gained from the Environment Agency, but no information on ecological networks.

The NRN mapping report identifies areas for enhancement, and ecological networks and corridors. Data is also available on known areas of priority habitats and species. However, smaller corridors need to be identified at the site level, and because baseline data on priority habitats and species is not complete for the borough, it would be necessary to undertake site-specific surveys to ensure this information is up-to-date for each site, if these indicators are to be assessed at this stage. It should be considered whether adequate assessment of site suitability can be carried out with existing information at this stage, allowing further sifting of unsuitable sites, and further data on indicators can be gathered to inform preferred options.

Under Areas for Further Research, section 5.9. recommends further evidence studies to be commissioned to help inform plan making and delivery of new settlements. One of these is a Green Infrastructure Strategy, incorporating proposals for ecosystem services enhancements and environmental net gains. We strongly support this recommendation, and suggest that in and around the major settlements and strategic development site options more detailed mapping of ecological corridors, constraints and opportunities is undertaken.

We also strongly recommend the gaps in data for the other suitability indicators listed above are filled via suitable ecological assessments of each site option.

Site Options- biodiversity indicators

Below we highlight potential constraints and opportunities for each site that we have identified from available data, local knowledge and professional judgement. All sites have potential for priority species, and all will be under-recorded in terms of species records. There are no Nature Improvement Areas in Staffordshire.

A1. Gnosall North/East

- Local Wildlife Sites (LWS) – There are 4 LWS within 500m of the site. The disused railway line was previously designated as a LWS and should be reassessed. Hedgerows, ponds and burial ground within the site may have potential to be LWS.
- Regionally Important Geological Sites – none within the site.
- Priority Habitat- Native hedgerows, potential high-value ponds
- Wildlife corridors and stepping stones – Hedgerows, ponds, copses, railway line, road verges
- Green Infrastructure Corridor – Millennium Way, footpaths
- Public Open Space – burial ground off A518
- Protected and Priority Species- Recorded on site or within 1km- Badger, Hedgehog, White-letter Hairstreak butterfly, great crested newt, many bat species, starling. Likely to support priority farmland birds and other amphibians.
- Areas for habitat enhancement/ creation – None officially adopted, but opportunities within and adjacent the site to link existing LWS by strengthening habitats alongside the disused railway. Off-site enhancement opportunities to create/ restore habitats around Doley Common SSSI. Habitat priorities- wetland, grassland, woodland, hedgerows.

A2. Land between Gnosall and Haughton

- Local Wildlife Sites (LWS) – There is one LWS, 'Brick Hollow' within the site, supporting pools with semi-improved and marshy grassland, and one LWS within 500m of the site. The disused railway line was previously designated as a LWS and should be reassessed. Roadside hedges on Woodhouse and Shippy Lane potentially species-rich. Hedgerows, ponds, watercourses and grasslands within the site may have potential to be LWS.
- Regionally Important Geological Sites – none within the site.
- Priority Habitat- Likely priority habitat traditional orchard exists within the site at Hurst Farm. A field with good quality semi-improved grassland lies directly adjacent the eastern boundary. Native hedgerows, potential high-value ponds within the site.
- Wildlife corridors and stepping stones – Hedgerows, ponds, watercourses, copses, railway line, road verges
- Green Infrastructure Corridor – Millennium Way, footpaths, small lanes and trackways.
- Public Open Space – Millennium Way
- Protected and Priority Species- Recorded on site or within 1km- Badger, great crested newt, many bat species, several priority butterflies and moths. Likely to support priority farmland birds.

- Areas for habitat enhancement/ creation – None officially adopted, but opportunities within and adjacent the site to link existing LWS. Habitat priorities- wetland, grassland, woodland, hedgerows.

B. Seighford

- Local Wildlife Sites (LWS) – There is one LWS within and one LWS adjacent the site. There are a number of previously designated LWS in and around the site that should be reassessed. Hedgerows, ponds, watercourses and grasslands within the site may have potential to be LWS.
- Regionally Important Geological Sites – none within the site.
- Priority Habitat- Native hedgerows, potential high-value ponds within the site.
- Wildlife corridors and stepping stones – Hedgerows, ponds, watercourses, copses, woodlands, road verges
- Green Infrastructure Corridors –footpaths, small lanes and trackways.
- Public Open Space – unknown
- Protected and Priority Species- Recorded on site or within 1km- Badger, many great crested newt records within the site, bat species, Lapwing, Yellowhammer, Brown Hare, Polecat, several priority butterflies and moths. Likely to support more priority farmland birds.
- Areas for habitat enhancement/ creation – None officially adopted, but opportunities within and adjacent the site to link existing LWS. Habitat priorities- wetland, grassland, woodland, hedgerows.

C. Land north of Redhill

- Local Wildlife Sites (LWS) – There are 2 LWS, Whitgreave Wood and New Plantation within the site and none within 500m. Hedgerows, ponds, watercourses and orchards within the site may have potential to be LWS.
- Regionally Important Geological Sites – Whitgreave Reservoir within the site.
- Priority Habitats- Native hedgerows, potential high-value ponds and possible traditional orchards within the site.
- Wildlife corridors and stepping stones – Hedgerows, ponds, watercourses, copses, woodlands, road verges
- Green Infrastructure Corridors –footpaths, small lanes and trackways.
- Public Open Space – none nearby
- Protected and Priority Species- Recorded on site or within 1km- Badger, great crested newt, bat species, Lapwing, White-letter Hairstreak. Likely to support more priority farmland birds.
- Areas for habitat enhancement/ creation – None officially adopted, but opportunities within and adjacent the site to link existing LWS. Habitat priorities- woodland, wetlands, grassland, hedgerows.

D. Meecebrook

- Local Wildlife Sites (LWS) – There are 2 LWS within the site and 2 within 500m. The majority of the habitats within the MOD site have potential to be designated as LWS due to high value grassland and brownfield habitat and invertebrate populations. Hedgerows, ponds, watercourses, woodland and grasslands within the site as a whole may have potential to be LWS.
- Regionally Important Geological Sites – 3 near to the site.

- Priority Habitats- Native hedgerows, potential high-value ponds, semi-natural woodland, species-rich grassland and open mosaic habitats on previously developed land.
- Wildlife corridors and stepping stones – Hedgerows, ponds, watercourses, copses, woodlands, road verges
- Green Infrastructure Corridors –footpaths, small lanes and trackways. The dismantled railway adjacent the site may offer opportunities for a new green way.
- Public Open Space – open spaces within Yarnfield.
- Protected and Priority Species- Recorded on site or within 1km- Badger, great crested newt, bat species, Barn Owl, large number of priority invertebrate species and bird species, Adder, Polecat, Kingfisher, Otter.
- Areas for habitat enhancement/ creation – None officially adopted, but opportunities within and adjacent the site to link existing LWS. Habitat priorities- woodland, wetlands, grassland, hedgerows. The site would require a substantial area to be retained as natural habitats, to achieve a net gain for biodiversity

E. Hixon

- Local Wildlife Sites (LWS) – There are 2 LWS within 500m of the site. The former Hixon airfield is itself an important site for ground nesting and wintering priority farmland birds, and has been assessed as a potential site of county importance for birds in studies for a previous planning application in the area. The farmland on the site therefore has potential to be a LWS.
- Regionally Important Geological Sites – none nearby.
- Priority Habitats- arable field margins, grassland and hedgerows.
- Wildlife corridors and stepping stones – The site itself is a stepping stone for bird species, the dismantled railway line to the north is a linear wooded corridor.
- Green Infrastructure Corridors –footpaths, dismantled railway.
- Public Open Space – none nearby
- Protected and Priority Species- Recorded on site or within 1km- Badger, Brown Hare, Golden Plover, Lapwing, Skylark, Corn bunting, Hobby, Grey Partridge, Barn Owl, Kingfisher, Yellow wagtail
- Areas for habitat enhancement/ creation – The site if developed would require a large amount of biodiversity offsetting elsewhere, as ground nesting and wintering birds would not be able to be accommodated within developments. Habitat priorities- arable habitats, wetlands, grassland.

F. Land East of Weston

- Local Wildlife Sites (LWS) – There is one LWS partly within the site- Shirleywich Fields and canal towpath. Hedgerows, ponds, watercourses and grasslands within the site may have potential to be LWS.
- Regionally Important Geological Sites – none nearby. However the northern part of the site has a large area of peat deposits.
- Priority Habitats- Native hedgerows, potential high-value ponds and possible species-rich and marshy grassland within the site.
- Wildlife corridors and stepping stones – Hedgerows, ponds, watercourses, copses, woodlands, road verges.
- Green Infrastructure Corridors –footpaths, small lanes and trackways.
- Public Open Space – none nearby
- Protected and Priority Species- Recorded on site or within 1km- Badger, bat species, Hedgehog, Polecat, Barn Owl, Lapwing, Kingfisher, Skylark, Linnet. Likely to support more priority farmland birds.

- Areas for habitat enhancement/ creation – A section of the River Trent to the west of the site is currently subject to a river restoration project lead by the Environment Agency. Opportunities within and adjacent the site to link existing LWS. Habitat priorities- wetlands, watercourses, grassland, hedgerows.

In conclusion, the existing evidence base data has not been used to inform the assessment, and the above evidence shows that more could have been used. All the site options have incomplete ecology baseline information to inform site selection, and further work to gather this is necessary, particularly updating LWS and priority habitat assessments.

From the available information, it would appear that site D. Meecebrook and site E. Hixon could be the most biodiverse sites, where significant avoidance and mitigation would be required to achieve a net gain for nature. The sites A1 and A2 at Gnosall, C. North of Redhill and F. East of Weston appear to allow a lesser impact on biodiversity and most potential for enhancement. However, all the sites have wildlife value, and further assessment is needed to accurately score the potential impacts and benefits of each option.

Section	2. A Spatial Portrait of Stafford Borough	Paragraph	The Natural and Historic Environment 2.17
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We feel that this section could be expanded to give a more informative portrait of the natural environment of the borough - the characteristics of most importance, and where the borough 'sits' in terms of environmental resources, to give context to plan policies.

Wetlands and peatlands should also be highlighted as key habitats within the borough, as the majority of statutory designated sites are wetlands. As increased tree cover is an aspiration within the new Local plan, it is worth noting that Stafford Borough currently has around 7% woodland cover, compared to an average of 10% in England.

Information on statutory designated sites should be amended for accuracy. There are 5, not 6 SACs/ RAMSAR sites in the borough- Motte Meadows is in South Staffordshire although adjacent to the Stafford Borough boundary. There are 16 SSSIs, 5 of which are also SAC/ RAMSAR sites, within or partly within the borough. Over half of the Cannock Chase SAC/ SSSI is within the borough, while Burnt Wood SSSI and Newport Canal SSSI in the west have very small portion overlapping the borough boundary.

Local Wildlife Sites are not mentioned- these are a major part of the nature network linking statutorily designated sites. These support many priority habitats and species, and some are of potential SSSI quality. There are at present 278 Local Wildlife Sites in the borough; 174 Sites of Biological Importance which are of county level importance for nature, and 104 Biodiversity Alert Sites, of district importance.

Overall, nearly 5000 hectares are covered by wildlife site designations, which constitutes around 8.3% of the borough. This compares with about 8.7% for the county as a whole, although lower than the most biodiverse districts, Cannock Chase and Staffordshire Moorlands, which have cover of 14% and 13% respectively.

To put this in context, the Convention on Biological Diversity Strategic Plan adopted in Japan in October 2010 includes 20 headline targets for 2020 (the 'Aichi' targets), which have informed the England Biodiversity Strategy. Target 11 states: 'By 2020, at least **17 per cent**

of terrestrial and inland water, and 10 per cent of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem services, are conserved through effectively and equitably managed, ecologically representative and well-connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscape and seascapes.’

Section	Section 3 Vision and Strategic Objectives	Question	3.A. Do you agree that the Vision should change? 3.B. Do you agree that the Vision should be shorter?

Yes, the vision should be concise, but reflect all of the themes the plan is seeking to address.

The plan vision also needs to recognise the contribution that the plan for further growth will make to the challenges that need to be addressed, and that will still apply after the plan period, particularly climate change.

Section	Section 3 Vision and Strategic Objectives	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?

Yes, the vision needs to include a strong commitment to minimising, adapting to, and mitigating the effects of climate change. The vision should not commit to growth beyond environmental limits.

Aside from the need to contribute from the Government’s commitment to net zero by 2050, the vision needs to recognise the key role the plan plays as a tool to tackle climate change both through mitigation and securing adaption to climate change effects. This is more than simply recognising the need to respond to climate change, the plan is a policy mechanism to tackle climate change now and in the future. Within the plan period it will not be adequate to simply recognise climate change, climate change is happening and requires a response. The plan needs to facilitate actions to tackle climate change as part of SBC Climate Change Action Plan and to meet government targets.

We would also like to see more specific mention of nature-based solutions to climate change, in line with the aspirations within the 25 Year Environment Plan. Particularly: resilient ecological networks, recognition of ecosystem services such as flood management and soil conservation, and the restoration of wetlands, peatlands and woodlands.

Section	Section 3 Vision and Strategic Objectives	Question	3.D. Should the spatially-based approach to the Objectives be retained? Does this spatially-based approach lead to duplication? 3.E. Is the overall number of Objectives about right?
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3.D. To remove a spatial element from objectives would risk producing generic and conflicting thematic objectives that do not recognise the differing development needs across the plan area or the settlement hierarchy.

Objectives applying to all spatial areas should be captured under borough wide objectives, which are likely to reflect the growing need for cross cutting theme-based objectives. Building on these would be distinct objectives that would apply to distinct areas, these would be used to define how the overarching objectives would apply to the different districts identified, using the evidence base.

If the evidence base feeds into the development of plan objectives correctly there should be no need for duplication, as each objective is specific to the area to which it applies.

3.E.No. There are too many objectives that are not distinct enough to distinguish overarching objectives of the plan, and those that apply to distinct spatial areas. The evidence base, including NRN mapping, should be used to produce defined objectives for each spatial area.

Section	Section 3 Vision and Strategic Objectives	Question	3.F. Should there be additional Objectives to cover thematic issues? If so what should these themes be?
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No. Thematic objectives that stand alone often conflict with each other, which does not allow for balanced and sustainable development that recognises the needs of an area, or responds well to the evidence base presented. The role of the local plan is to do the work now to balance issues, with policies that serve many objectives. Separate themes can serve to push difficult decision making 'down the pipeline' so that site allocation and development control decisions are further battles between competing needs.

Cross cutting themes should be identified and used to formulate objectives that would apply across the plan area. For example, climate change is a theme that would impact on a number of objectives, and can only be tackled effectively if addressed 'across the board'. This approach can also promote creative thinking and reveal multiple benefits that are not obvious when themes are kept separate. Climate change action often focuses on energy, transport and building design, but when applied to landscape and GI there are less obvious solutions. For example, restoring peat soils helps sequester carbon, but also preserves soil structure, helps with flooding and increases biodiversity.

A well-evidenced and balanced sustainability appraisal should be the starting point for embedding cross-cutting themes, so that the resulting policies interact well and are easy and effective to apply.

Section	4. Sustainability and Climate Change	Question	4.B. Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?
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All options for renewable energy need to be considered with the implications for the natural environment in mind. Opportunities to realise multiple benefits also need to be identified, such as installing generation plants where biodiversity net gain can be achieved, and helping to diversify farm incomes and support sustainable farming.

Solar – solar farms where landscape/ visual and network connections allow, and near to communities that need them. These can provide excellent opportunities for grassland and heathland creation, although they impact negatively on ground nesting farmland birds. Therefore site location and design need to consider appropriate mitigation to achieve net gains for nature. Explore opportunities for solar panels on large buildings and in car parks.

Wind turbines – at suitable sites avoiding visual and ecology constraints following best practice guidance. Mapping of constraints and opportunity areas would be useful, as well as standards for landscape and ecology enhancement.

Anerobic digestion plants to create green gas from waste or energy crops – where there is sufficient transport infrastructure.

Section	4. Sustainability and Climate Change	Question	4.C. Should the council introduce a policy requiring large developments to source a certain percentage of their energy supply from on-site renewables?
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We would support this policy, but this needs to be coupled with policies on sustainable design to reduce energy requirements as far as possible in first instance.

Section	4. Sustainability and Climate Change	Question	4.D. Should the council allocate sites for wind energy developments in the Local Plan? If so, where should they be located?
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Yes, although this should be part of more comprehensive review of likely requirements and the types of energy that will be needed, in order to select sites. Allocation of sites for a range of renewable, not just wind, would help ‘front load’ the system by picking suitable sites and avoid conflict at application stage.

Locations should be identified based on gathering relevant data on site suitability and ecological constraints as per best practice guidance. Use of the NRN mapping evidence would assist in this.

Section	4. Sustainability and Climate Change	Question	4.E. Should the council implement a higher water standard than is specified in the statutory Building Regulations?
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We would support this, as Climate Change could mean water resources become increasingly limited through the summer months. All encouragement of reduced usage and efficiency should be used. Rainwater harvesting should also be required for all developments/ buildings over a certain size, and rainwater butts installed as standard on all new houses. This would also help to manage surface water run-off and flooding.

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

a), b) and c) It is not possible to make informed judgements from an environmental perspective on additional or best spatial options at this stage, because the sustainability appraisal is incomplete, and all available and required evidence base information, such as the NRN mapping, has not been used to assess the scenarios.

However we provide further comment in the attached appendix regarding growth scenarios, housing numbers and demographics.

Section	5. Development Strategy	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.

See answer to 5.F.

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

			iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.
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See answer to 5.F.

Section	5. Development Strategy	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?
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See answer to 5.F.

Section	5. Development Strategy	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?
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See answer to 5.F.

Section	5. Development Strategy	Question	5.P. Do you agree that settlements of fewer than 50 dwellings should not have a settlement boundary? If not please provide reasons for your response including the specific settlement name.
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No we do not agree. We would like to see all settlements protected from inappropriate development, and clarity as to where development is acceptable. It is the smaller settlements where development is more likely to impact on important habitats. The lack of boundaries creates a loophole when considering justification for sustainable development in rural areas and lead to poorly designed infill proposals that can threaten wildlife.

Section	5. Development Strategy	Question	5.Q. Do you agree with the methodology used to define settlement boundaries?
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The methodology should consider the presence of all Local Wildlife Sites, not just SBIs. Many Biodiversity Alert Sites can be of higher value than their current designation level, if they have not been recently assessed. They also have good potential to be restored or

enhanced. Priority habitats also need to be considered, as many can occur within or on the edges of settlements. Traditional orchards, ponds, native hedgerows, diverse road verges and open mosaic habitats on previously developed land are all examples. It may not be possible to exclude all of these from settlement boundaries, but identifying such features of value would inform decision making. Excluding important habitats would help conserve the character of settlements and lead to fewer conflicts threats to important habitats in the future.

Section	6. Delivering Economic Prosperity	Paragraph	6.1
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Regarding the provision of high quality employment land, this section should include recognition of how green infrastructure within employment areas can make attractive places to work, how this should influence site selection and how it should be included in site design. Employment sites are generally less densely developed and less disturbed than housing sites, and so can provide valuable new habitats and protect/ link existing ones. Green areas and interaction with nature can benefit employees physical and mental health, contribute to sustainable drainage and help mitigate visual impacts. They can also have a multifunctional role, becoming destinations in themselves as a safe place to walk for local residents. The development of Redhill Business Park is a very good example of this approach, combining excellent business infrastructure with an attractive setting that includes an existing wildlife site which is now linked by new wetland, woodland and meadow habitats. The circular footpath network is enjoyed both by employees and visitors to the local pubs and restaurants on the adjacent site.

We would like to see more emphasis and policy supporting green infrastructure and nature networks within employment sites, following best practice.

Section	6. Delivering Economic Prosperity	Question	6.L.The Visitor Economy is considered by Policies E6 (“Tourism”) and E7 (“Canal Facilities and New Marinas”) in the currently Adopted Local Plan. a) Do these Policies continue to be sufficient in their current form or do they need adjustment? If so, how? b) Are there any Visitor Economy themes that should be more explicitly addressed?
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Policies on tourism need to encourage sustainable travel, and ensure that activities serve to enhance, not degrade, important habitats such as Cannock Chase, canal networks and wildlife sites. Consider requiring development linked to tourism to contribute to green infrastructure off-site where it can benefit the wider area/ landscape/ local nature networks. Also in any GI strategy, provision of alternative green spaces where there is evidence of pressure/ demand causing damage to an area. Parking in rural areas can also be an issue that impacts on road verges and damages habitats, and this should be managed by well-designed, sustainable car parking facilities that add high quality GI benefits.

Section	8. Delivering Housing	Question	8.A. Should the council continue to encourage the development of brownfield land over greenfield land?
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Only where the brownfield land is not of high environmental value, and where net gain for nature can be achieved. Brownfield sites are often more biodiverse than intensively farmed greenfield sites, and may be more viable and beneficial to restore to an alternative use such as green space or nature conservation. This would depend on the individual site conditions and needs within the area. The relative merits of any piece of land in terms of environmental sustainability should be considered on a site-by-site basis.

Section	8. Delivering Housing	Question	8.B. Do you consider that the enforcement of minimum density thresholds would have a beneficial impact on development within the borough? If so, do you consider: the implementation of a blanket density threshold; or a range of density thresholds reflective of the character of the local areas to be preferable?
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Enforcing minimum density thresholds can have negative implications for delivery of other objectives. It can reduce space for community green space, ecological mitigation and enhancement, and natural solutions such as sustainable drainage and urban trees providing shade. It does however depend on how density is measured and the policy applied. If density were measured only within areas actually developed, this would facilitate provision of green/ blue infrastructure separately.

A range of density thresholds would give more flexibility to include greenspace, wildlife habitats and tailor design to site conditions/ location. However it is important that the more dense developments have communal green areas and access to nature nearby, as in-development landscaping and private gardens are more limited.

Section	8. Delivering Housing	Question	8.N. a)Should the council introduce a policy requiring all new developments with a site capacity of over 100 dwellings to provide 5% of those plots as serviced plots available for self and custom build homes? b) Should the council allocate plots for the purpose of self-build throughout the borough?
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Yes.

Section	9. Delivering Quality Development	Question	9.A. Should the Council a. Have a separate policy that addresses Green and Blue Infrastructure? b. Identify specific opportunities for development opportunities to provide additional green infrastructure to help provide the “missing links” in the network?
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- a. No- we felt it is most useful to integrate green and blue infrastructure, as the two are very much linked and co-dependant, and need to be considered together to achieve multifunctional areas. This is particularly true of SuDS.
- b. Yes. This could be done through a green infrastructure strategy and delivery plan. The NRN mapping highlights a number of opportunity sites, and gives a basis for identifying more.

Section	9. Delivering Quality Development	Question	9.B. How should Plan Policies be developed to seek to identify opportunities for the restoration or creation of new habitat areas in association with planned development, as part of the wider nature recovery network?
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A Green Infrastructure Strategy should be formulated, leading to a green infrastructure delivery plan with costed site-specific projects that can then be funded through development contributions, partnerships and grants. The NRN mapping and other evidence should feed into this.

A call for sites for GI/ biodiversity offsetting uses could be made, in a similar way to development sites. New sites should be allocated for multifunctional green spaces, that provide ecosystem services e.g. access to nature, flood management, landscape enhancement, access links, allotments, green burial sites etc.

Policy to protect and enhance Local Wildlife Sites should seek to strengthen this resource by applying the principles within the Making Space for Nature Review: that there should be more, bigger, better and joined wildlife sites. Both strategic green infrastructure planning, and requirements within developments, should secure the creation of new LWS, expand and restore existing sites, and link them.

Peatlands- Policies should seek to protect the functioning ecological units of peatlands, and their catchments, from harmful activities. Excavation and degradation of peat soils should be avoided as part of any development, and restoration of wetlands in peat-bearing areas should be sought. As part of green infrastructure delivery, develop and fund projects to restore peatlands for carbon capture and other benefits.

Policies should seek to resource and secure ongoing monitoring of habitat loss and gain to provide an up-to-date evidence base. This could be achieved through standard conditions on all planning permissions, and using a proportion of developer contributions to help maintain ecology data.

Section	9. Delivering Quality Development	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
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			enhancement measures on development sites
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a) Yes. Buffer zones are always appropriate for all designated sites, for protection and to help expand and link sites. The size and type of buffer zone required will vary significantly depending on the habitat type and sensitivity. For example, as site where nesting birds need to be protected from disturbance would require a different buffer zone to an area where the public can be encouraged to use. Wetlands and peatlands require the largest buffers, as they are dependant on sympathetic drainage and management of surrounding land and natural unpolluted water catchments. We would encourage setting of standard minimum buffers for particular sites and habitats, and assessment to determine impacts and requirements for particularly vulnerable sites.

b) Yes, if damage to irreplaceable habitats can be avoided and a net gain for nature and other environmental standards can be achieved.

c) Yes. There is very little monitoring at present, so it is unclear whether mitigation is effective, and how much loss or gain is being achieved. A mechanism to secure, and where necessary, enforce monitoring and management is required. This could be achieved through the Biodiversity SPD and forthcoming Biodiversity Offsetting strategy, and feed into ongoing NRN mapping.

Section	9. Delivering Quality Development	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?
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We consider that the approach could be strengthened, with further evidence and realistic targets for increasing cover. Stafford Borough currently has around 7% woodland cover, compared to an average of 10% in England. The 25 Year Environment Plan has a target to increase overall woodland cover to 12% by 2060. We suggest increasing woodland cover to at least the national average of 10% within the plan period. Data on tree cover across the borough and in settlements would show where levels are lowest and where targeted action could be taken through new developments or GI projects.

Consider adopting policies similar to the National Forest, which has specific SPD with policies requiring a % of all developments to provide tree planting or other complimentary habitats, or a commuted sum to help provide this elsewhere.

Identify specific sites for woodland creation that will link existing woodlands especially ancient woodlands, enhance degraded landscapes, and provide screening.

A Hedgerow Restoration Fund could be created to restore, enhance and plant more hedgerows, including increasing hedgerow trees. This would not take up large areas of land but provide better habitat connectivity as well as landscape enhancement. Areas near to footpaths and linking LWS could be prioritised.

Section	9. Delivering Quality Development	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.
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Yes.

This would diversify food sources, and provide more space for habitat enhancement and access to nature. It would also give opportunities for multi- generation interaction, learning of new skills, better health & wellbeing, and activities supported by community groups and charities. Long-term management mechanisms need to be considered.

Section	9. Delivering Quality Development	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?
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Yes. This would help contribute to the NRN and GI objectives, and encourage design that reflects the importance of landscape setting. This increases a senses of place which is very important for new growth points and extensions.

Section	9. Delivering Quality Development	Question	9.H. Do you consider there are areas in the Borough that should have the designation of Special Landscape Area? If so, please explain where.
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Consider areas where there are concentrations of very high and high distinctiveness habitats, as shown on the Habitat distinctiveness map for Stafford Borough within the Nature Recovery Network Mapping 2019. These might include the Sow and Penk River corridors, the ancient woodlands and parklands around Swynnerton and Trentham, The meres and mosses of Aqualate/ Gnosall/ Norbury, the ancient woodlands and historic parklands on the Trent at Shugborough, Tixall and Ingestre, and the ancient woodlands and streams to the north and east of Stone.

Section	9. Delivering Quality Development	Question	9.L. To support a new Local Design Review Panel should the new Local Plan: a. Require complex or Large-Scale Development to be subject to review by a Regional Expert Design Panel, to form a material consideration in the planning decision?
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Yes very definitely. This approach would help get all disciplines involved, to achieve good environmental design and find sustainable solutions.

Section	9. Delivering Quality Development	Question	9.M. Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?
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Yes. Especially areas with no neighbourhood plan in place. Very important for local engagement in the planning system and conserving valued spaces. These sites are also potentially ideal for delivering biodiversity offsetting and other GI improvements.

Section	9. Delivering Quality Development	Question	9.N. a. Do you believe that there are areas within Stafford Borough that are poorly served by public open space. If so where? b. Are there any other Borough-wide facilities you feel should be associated with open space? c. Are there any settlements that you believe are lacking in any open space provision? d. Should the Council seek to apply Play England standards to new housing developments? e. Should the Council seek to apply Fields in Trust standard to providing sports and children's facilities? f. Should the Council seek to apply Natural England's ANGSt to new development? g. Should the Council seek to develop a bespoke standard in relation to open and/or play space? h. Do you consider that developments of over 100 houses should incorporate features that encourage an active lifestyle for local residents and visitors (eg Play areas, open spaces, sports facilities)? i. Do you consider that developments over 100 houses should provide direct connections from the development to the wider cycling and walking infrastructure? j. Should the Council require all high density
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			schemes to provide communal garden space?
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- a. Yes- there is a need to identify gaps in resource via a green space audit and ANGSt study.
- b. Yes- opportunities for natural play, in semi-natural habitats with natural features such as logs, mounds, water features etc.
- c. YES. Need to gather data and also ensure all new development contributes to natural green space.
- d. Yes
- e. Yes
- f. Yes. Ensure these are multifunctional.

Section	10. Environmental Quality	Question	10.A The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the council; a) Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development? b) Ensure all major development is accessible by regular public transport? c) Enforce Air Quality Management Zones around areas of notable biodiversity importance? d) Employ any further methods which you consider will aid in the improvement of air quality within the borough?
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10.A a) we would support this, but the LPA needs to be aware that in transition to electric powered vehicles, issues of air quality will shift from the impacts of NOx to fine particulate pollution which still has implications for health. See www.wm-air.org.uk

b) We support the need to locate development near public transport, but need to recognise that transition to electric powered vehicles will change air quality issues as above. Therefore, measures should be considered to ensure the design of major development minimises poor air quality exposure, using green infrastructure. For example, providing sheltered green routes away from pollution sources, and using urban vegetation screens and surfaces to filter and remove pollutants.

C) Yes, we agree with air quality management zones but as part of a wider strategy to improve air quality across the borough.

d) Consider the use of GI to help improve air quality, along with the range of other multifunctional benefits such as biodiversity, reducing the urban heat island effect, sustainable drainage etc. GI can help to landscape development areas in such a way that air quality is maintained or improved - not just through deposition but also through adjusting air pollution exposure levels to reduce concentrations. Refer to GLA guide and first steps for urban air quality.

Greater London Authority Guide – Using green infrastructure to protect people from air pollution.

Produced in consultation with the Birmingham Institute of Forest Research (University of Birmingham), the Global Centre for Clean Air Research (University of Surrey) and Transport for London.

<https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/using-green-infrastructure-protect-people-air-pollution>

Ferranti, E.J.S., MacKenzie, A.R., Ashworth K., and Hewitt C.N. 2017. First Steps in Urban Air Quality. A Trees and Design Action Group (TDAG) Guidance Document. UK: London. Available from: Epapers or Research-Gate DOI: 10.13140/RG.2.2.29538.22726

Hewitt, C. N., K. Ashworth, and A.R. MacKenzie. (2019)
Using green infrastructure to improve urban air quality (GI4AQ). Ambio,
DOI: 10.1007/s13280-019-01164-3

Section	10. Environmental Quality	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?

Yes, this would remove the need for individual assessments which are difficult and inaccurate. However this must be part of a wider strategy to improve air quality across the borough through all available options.

Section	11. Health and Wellbeing	Question	11.A. Should the New Local Plan 2020-2040 continue to address health and well-being via relevant associated policies in the way the currently adopted plan does? b. Or should an alternative approach to the integration of health and well-being issues into the New Stafford Borough Local Plan be adopted? c. Where should references to Health and Wellbeing be strengthened in the New Stafford Borough Local Plan?

Health and wellbeing is a major cross-cutting theme that needs to feed into all aspects of the plan.

The plan must reflect the importance of nature-based solutions and green infrastructure in improving health and wellbeing, and preventing negative impacts on health from other sources such as air pollution, climate change and even road safety. The local plan should recognise, and help deliver, the benefits that access to nature has for health and well being. For example: green spaces, green roofs and walls, safe green access routes, communal areas to garden and grow produce and opportunities for people to congregate and reduce

social isolation. Developments need to be permeable with green infrastructure and nature corridors so that people can benefit in terms of both mental and physical health. Play areas should include places and features for natural play, as well as formal play provision.

GI is also vital for climate change adaption and future-proofing urban areas, such as reducing flooding in high rainfall events, and shade provision during heatwave events. This also serves to reduce physical, financial and mental strain on communities.

Section	12. Connections	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) Yes.

b) Identify shortfalls and gaps, plan for new walking and cycling infrastructure, use CIL/ s106/ on-site contributions to deliver improvements.

Section	14. Monitoring and Review	Question	14.A. a) Do you agree with the general approach to monitoring and reviewing New Local Plan policies and proposals? b) Are the currently employed indicators appropriate to monitor key planning policy issues?

a) The approach focuses very much on numbers and quantities. Monitoring needs to measure the quality of development and infrastructure, to reflect whether it meets the objectives of the plan. Monitoring of completed developments and infrastructure is necessary alongside monitoring planning permissions given, as delivery 'on the ground' is the key output.

b) The approach focuses on the amount of new GI provided and changes in areas of biodiversity importance – however this will not capture all biodiversity gain. Further monitoring is required for biodiversity gain and outcomes as per NPPF/ PPG.

Biodiversity net gain should be measured for all new developments.

The % cover of designated sites is a good indicator of the natural health of the borough, and we feel that the international 'Aichi' target of 17% (a 6th) of land protected and/or managed for nature is a good figure to aim for. Currently the coverage in Stafford Borough is just over 8.3%, so needs to roughly double to meet this target. However, as there are still many un-identified and undesignated habitats to be assessed for LWS status in the borough, the true coverage is likely to be higher. New habitat creation through biodiversity offsetting and other partnership projects will also increase the area of high-quality habitats.

However, the condition and connectivity of wildlife sites is as important to their function as their area. Monitoring of the principles set out in the Making Space for Nature review of wildlife sites in England would support objectives in the England Biodiversity Strategy 2020, i.e. – sites should be More, Bigger, Better, and Joined. The number, size, condition and connectivity of all wildlife sites should be monitored through up-to-date assessments and NRN mapping. Restoring 75% in area of protected sites to favourable condition is a key target within the 25 Year Environment Plan, and should be a monitoring indicator.

Monitoring of woodland / tree cover is also an important indicator, as it is recognised within the NPPF, is a key aspiration within the new Local Plan, not only for wildlife but landscape, amenity and climate change mitigation. The 25 Year Environment plan 2018 has an aspiration to increase woodland cover in England from the current 10% to 12% cover by 2060, and we recommend the Local Plan adopt a suitable target to contribute to this.

Identifying, protecting and restoring peatland sites within the borough would contribute to climate change mitigation, as well as flood management and enhancing priority habitats. The area of peatlands protected and restored to good condition should be established through baseline studies, and improvements monitored.

Appendix 1

Growth scenarios, housing numbers and demographics

Staffordshire Wildlife Trust has obtained independent advice on growth options presented in the consultation, and our comments are as follows.

Executive Summary

- 1 Staffordshire Wildlife Trust hopes that, as the new local plan progresses towards public examination in 2022, the following issues will be addressed:
- 2 **The development strategy** — The current settlement hierarchy and the housing distribution policies¹ appear able to meet the needs of an ageing population. We believe that the “*high growth*” spatial scenarios are neither deliverable (a shortage of workers & restricted mortgage availability) nor desirable (undermines economic growth prospects of neighbouring areas & will encourage environmentally damaging patterns of cross boundary commuting to work).
- 3 **Development levels** — For reasons set out in points (a) to (c) below, we suggest that the evidence supporting the “*high growth*” spatial scenarios (D to G) should be re-assessed:
 - a) **Demographic changes** — The development plan must reflect the impact of the Borough’s ageing population and limited workforce. If the Borough’s preferred option is a high jobs growth strategy, then the evidence base should indicate where the workforce will come from, i.e. will high economic growth in Stafford Borough undermine economic regeneration in neighbouring areas?
- 4 **Employment land** — Stafford Borough, and most neighbouring authorities, have or are preparing local plans, with “*high growth*” strategies, i.e. local plans propose jobs growth substantially in excess of the working-age population change over the plan period. This is only possible through accelerated inward migration. Collectively these strategies lack credibility, because UK unemployment rate is at a 45 year low, the ONS expect the UK workforce size will grow slightly to 2028 and then be static to 2043, and there appears to be a policy shift towards clamping down on international migration.
 - a) **Housing targets** — Housing targets associated with “*high growth*” spatial scenarios lack justification for reasons set out in paragraph 4(b) above. Since 1981, an average of 423 homes have been completed annually, with **private sector completions exceeding 500dpa on six occasions**. The standardised housing needs assessment (at least 408dpa) appears more credible after considering demographic factors (refer paragraph 4(a) above) and mortgage availability constraints (refer Appendix C Market signals).

¹ Settlement hierarchy y (SP3) : county town, market town, key villages;

Housing Distribution (SP4) 70% Stafford, 10% Stone, 12% key villages.

- b) Achieving the adopted plan's housing target of 500dpa will be very challenging. The latest ONS household growth projection is only 210dpa. Since 1981, an average 4 of 23 homes have been completed annually, with private sector completions exceeding 500dpa on six occasions.
- 5 **Sustainability Assessment** – The spatial scenarios sustainability rankings should be reconsidered once the following information is added to the evidence base:
- a) A more realistic assessment of future jobs growth given factors set out in paragraph 4(a) above.
 - b) A more realistic assessment of the impact of high house prices / restricted mortgage availability (refer Appendix C) will have on population growth / housing need.

Climate change

Development levels / Climate change mitigation – As the scale of development increases, environmental harm generally rises because habitat loss also increases. Hence “*high growth*” spatial scenarios² require more careful assessment. The Trust is concerned some of the consultation document's spatial scenarios propose development levels substantially in excess of the Borough's needs over the period 2020–2040. For example:

- i) Demographic data shows the **workforce size will fall by around 2,500 persons, yet “policy on” spatial scenarios D to G propose jobs growth of 6,000 and 12,500 persons**. This contradiction should be addressed within future versions of the development plan, and within the evidence base.
- ii) High house prices (relative to wages) in the Borough, encourage cross boundary commuting to employment sites in the Borough, because neighbouring districts have substantially cheaper homes, which makes it easier to secure a mortgage.
- iii) Within the Borough 74% of travel to work is by car. Taken together, points (i) and (ii) above suggest that ambitious economic development plans may create jobs, but will simultaneously encourage commuting by car, thus boosting greenhouse gas emissions, damaging air quality and harming the environment.

The Development Strategy

- 6 The Trust supports the current sustainable settlement hierarchy policy (SP3) and the housing distribution policy (SP4). **As only the 65+ age group increases in the period 2020-2040** (see Appendix A Table 1) major settlements are the most sustainable way of meeting the needs of an ageing population.
- 7 The Trust is sceptical about jobs growth scenarios listed in Table 1 below because the “*Economic and Housing Development Needs Assessment (2020)*” report fails to recognise that demographic changes and mortgage availability constraints, which restrict the higher jobs growth scenarios, namely:
- **Demographics** – Within the Borough, the 15-65 age group will change by between -5,000 and +5,000 persons over the plan period 2020–2040. If neighbouring authorities, with strong migratory links, are included this change (in the 15-65 age group,) is in the range between -6,000 and +4,500 persons—see Appendix A Table

² Paragraph 5.8, Issues and Options consultation document

- **Mortgage availability** – Reduced inward migration has been influenced by mortgage availability restrictions³. The Borough’s median house price is over 6.75 times earnings – see Appendix C Figure 4. Before the average worker would qualify for a mortgage, wages would have to rise by 30% or house prices would have to fall by 30%. The effect can be seen in Appendix B Table 1, while Stafford Borough’s population growth rate is falling, areas with cheaper housing (Newcastle-under-Lyme and Stoke-on-Trent) are experiencing constant or rising population growth.

Table 1 : Potential Development Scenarios⁴

Scenario	Description	Development Levels
A) Standard Method	Housing need calculated using the Government’s standard method	Housing : +408dpa Jobs 2020–40: not stated
D) Cambridge Econometrics	Homes needed to accommodate the workforce based on Cambridge Econometrics baseline employment growth projection	Housing : +435dpa Jobs 2020–40: +5,929
E) Jobs growth policy on	Homes needed to accommodate the workforce based on major new projects including Stafford Station Gateway and a possible new garden community	Housing growth: +647dpa Jobs growth: +12,473
F) Past trends Jobs Growth	Homes needed to accommodate the workforce based on past trends (2000-18) jobs growth	Homes: +683dpa Jobs 2020–40: +13,126
G) Jobs Growth – Jobs Boost	Homes needed to accommodate the workforce based on CE baseline forecast with net growth increased by 50%	Homes: +540dpa Jobs 2020–40 : +8,900

8 Irrespective of the Borough Council preferred spatial development option, we would recommend that the following investigations be undertaken and added to the evidence base:

- a) **Workforce availability** – Demonstrate the number of workers likely to be available within the Borough or areas with strong migratory links. Any significant shortfall to the jobs growth target should be explained.
- b) **Housing deliverability** – Demonstrate that sites are economically viable (including developer obligations, such as affordable housing, schools, highways, etc.) at house prices within Bank of England lending limits⁵.

³ Bank of England Prudential regulations require that not more than 15% of new mortgage lending can be for houses worth more than 4.5 times the borrower’s income.

⁴ Paragraph 5.8, Issues and Options consultation document.

⁵ no more than 15% of new mortgage lending can be for houses worth more than 4.5 times the borrowers income.



Development Levels

- 9 The consultation document appears to suggest that land availability is the limiting factor and that allocating more land can significantly accelerate both jobs growth and house building rates. We could argue that the converse is true. Jobs growth will be limited by the supply of workers, while private sector demand for homes is constrained by mortgage availability. In Stafford Borough both constraints are acute.

Demographic changes

- 10 In determining the development priorities over the plan period (2020–2040) the following should be taken into account (refer Appendix A for full details):
- Persons aged 65+ will increase by over 10,000;
 - The change in persons aged below 65 will fall in the range -5,000 to +5,000 people.
 - Latest ONS population projections state that 84% of UK population growth (2018–2043) will be due to net international migration;
 - The UK workforce size will rise slightly to 2028 and then be unchanged to 2043.
- 11 In preparing the new local plan, the needs of an ageing population should receive more emphasis, while striving for economic growth levels that well in excess of worker availability, should receive less emphasis.
- 12 There appears to be a clear contradiction between proposed development levels (Section 6 : Economic Prosperity & Section 8: Housing) and the underlying evidence. NNPF paragraph 31 requires that plan policies should be underpinned by relevant evidence and should take market signals into account.

NPPF31: "The preparation and review of all policies should be *underpinned by relevant and up-to-date evidence*. This should be *adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.*" [Our emphasis]

- 13 We are concerned that many of the development scenarios imply accelerated land usage while the underlying evidence indicates that the economic, social and environmental needs of the community can be met in full, at lower development levels of development than were achieved in the past. We ask that the Borough Council considers the paragraphs below in relation to requirements for employment land and for housing.

Employment land

- 14 The economic prosperity chapter (Section 6) says that forecast "housing growth over the coming years requires a commensurate increase in job provision"⁶. We agree. The underlying facts are:
- i) The 65+ age group (i.e. low employment levels) produces the vast majority of forecast household growth;
 - ii) The Borough workforce is shrinking or only growing slowly as are neighbouring areas with strong migratory links;

⁶ Paragraph 6.5: Providing the Right Land and Buildings for Employment

- iii) The UK workforce is forecast to expand slowly to 2028 and then be static to 2043; and
 - iv) UK migration policy is under review but is expected to restrict migration from overseas.
- 15 So employment land requirements are likely to be dictated by labour availability. Of the major employment sectors⁷, the health and social care sectors must be prioritised due to an ageing population. The wholesale / retail trade and manufacturing will have to adapt to a shrinking pool of workers.

Housing

- 16 Housing targets associated with “*high growth*” spatial scenarios lack justification for reasons set out above.
- 17 The housing boom, which preceded the financial crises, unduly influenced the evidence⁸ underpinning the adopted plan’s housing target (500dpa). Earlier and later household/population growth rates have been slower – refer Appendix B Figure 2. The standardised housing need assessment (408dpa) should be regarded as a credible housing target.
- 18 “*Significantly boosting the supply of homes*” (NPPF 59) is national policy. However maintaining the stability of financial institutions is arguably a higher priority. Bank of England regulations restrict mortgage lending to insulate banks from bubbles in property markets. This policy will endure over the new local plan period. Stafford Borough, with higher house price/earning ratios than Newcastle-under-Lyme or Stoke-on-Trent, will find it more difficult to boost housing deliveries because mortgage availability restrictions will be more significant.
- 19 The impact on private sector housing demand is described in more detail in Appendix C (Market Signals). To boost housing deliveries whilst remaining within Bank of England mortgage lending restrictions, the following would have to be considered:
- A significant supply of homes at a substantial discount (say 30%) to current house prices
 - A return to public sector house building;
 - Financial assistance (e.g. tax relief on mortgage interest) to help younger households to get on the property ladder.
 - Various measures to boost productivity and real wages (e.g. better education).
- 20 It should be noted that for the three years ending Mar/2019, housing associations were responsible for a much higher proportion dwellings completed – refer Appendix B Figure 1. This was due national house builders choosing to offload surplus stock (at a substantial discount) in anticipation of a weakening economy / a possible negative impact from Brexit. This is a once-off effect and does not infer stronger housing demand over the new local plan period.

Kate Dewey BSc (Hons) MCIEEM
Senior Planning Officer

⁷ Paragraph 6.13: Type of Employment

⁸ The 2008-based household projection was the basis of the Strategic Housing Market Assessment (2012)

Demographic changes in Stafford Borough (2020–2040)

- 1 The Borough's expected (2016-based) rate of population growth of +5,200 persons 2020–2040 (refer Table 1 below) is under half the +14,200 persons assumed¹ by the current adopted plan – also see Appendix B Figure 2. In contrast neighbouring authorities with strong migratory links with the Borough (e.g. Stoke-on-Trent and Newcastle-under-Lyme) have rising populations growth rates and household growth rates which are constant or rising. This suggest that migratory pressure from the potteries is reducing, probably because houses are cheaper (so easier to secure a mortgage) and house building rates are improving. This limits the Borough's capacity to “import” labour in order to support an accelerated growth strategy. The latest ONS population projection (2018-based), released on 24th March 2020, shows dramatically faster population growth – refer Table 1 below and Appendix B Figure 2. **Based on the 2018-based projection, Stafford Borough's expected population in 2040 is around 12,000 persons larger than the standardised housing needs assessment assumes.** This projection should be treated with caution as a one-off event, which occurred during the projection's data collection period, will not recur over the plan period 2020–2040. This is explained in the paragraph below.
- 2 Following the Brexit referendum (23rd June 2016) and **in anticipation of a weaker economy/housing market, national house-builders sold sites (under development) to Housing Associations, at significant discounts.** The surge in housing completions by Housing Associations (within Stafford Borough) can be observed in Appendix B Figure 1 below. The national house-builders expected house prices to fall and are likely to have incurred a loss (or make no profit) on these transactions, i.e. this event is not repeatable because such transactions lack economic viability.

Table 1: Population change by age band, in Stafford and neighbouring districts

	Change Aged 0-14 Persons ('000)	Change Aged 15-65 Persons ('000)	Change Aged 65+ Persons ('000)	Change All Ages Persons ('000)
2014-based projection – population change 2020–2039				
Stafford	-0.5	-2.4	10.8	7.8
Stoke-on-Trent	-1.3	-0.3	14.1	12.6
Newcastle-under-Lyme	0.1	0.2	8.4	8.5
South Staffordshire	0.4	-3.7	9.4	6.0
Total	-1.3	-6.2	42.7	34.9
2016-based projection – population change 2020–2040				
Stafford	-1.0	-3.7	9.8	5.2
Stoke-on-Trent	-1.4	-0.1	13.5	11.9
Newcastle-under-Lyme	0.3	1.8	7.6	9.8
South Staffordshire	-0.3	-4.1	8.7	4.4
Total	-2.4	-6.1	39.6	31.3
2018-based projection – population change 2020–2040				
Stafford	1.0	4.4	11.7	17.1
Stoke-on-Trent	-2.3	3.4	11.5	12.7
Newcastle-under-Lyme	0.0	2.5	7.2	9.7
South Staffordshire	0.5	-2.0	8.2	6.7
Total	-0.8	4.4	38.7	46.3

Source: ONS – Table 2: Subnational Population Projections

¹The Stafford Borough adopted plan (2011–2031) set a housing target of 500 dpa. This was based on the 2012 SHMA, which relied on the DCLG's 2008-based household growth projection – the 20 year population growth (2011–2031) was 14,300 persons.

- 3 Additionally the expected population growth rate for England has also declined significantly – refer Table 2 below.

Table 2: England – Twenty year population growth projections

ONS projection basis	Period	Persons Change
2008-based	2008–2028	+7.6 million
2014-based	2014–2034	+ 7.5 million
2016-based	2016–2036	+5.1 million
2018-based	2018–2038	+4.8 million

Source: ONS – Table 2

- 4 Tables 1 and 2 above highlight the fundamental issue with any of the “jobs boost” growth strategies – **where will the workers come from?** The paragraph below draws attention to the latest ONS commentary (regarding the 2018-based population projection), especially in relation to the supply of labour.

“This means that of the 3.0 million increase in total [UK] population [between mid 2018 and mid 2028], 0.8 million (27%) is projected to result from the higher number of births than deaths and 2.2 million (73%) is projected to result directly from net international migration.”

“Over the full 25-year period between mid 2018 and mid 2043, the proportion of growth resulting from the balance of births and deaths is projected to be lower, at 16%, and that from net international migration is projected to be higher, at 84%.”
Our [additions] / emphasis

- 5 Table 3 below shows the impact on the Borough’s demographic profile of record numbers of dwelling completions, after 2015, by Housing Associations. The Old Age Dependency Ratio (OADR) is the number of people of state pension age per 1,000 people of working age. This includes planned increases in state pension age over the plan period 2020–2040. Inward migration has accelerated as a result of increased construction by Housing Associations. However Table 3 below shows that, over the plan period 2020–2040, for every two extra people of working age 3 extra people of state pension age will be added to the population. Since a high proportion of Housing Association tenants are likely to be retired or economically inactive (ill health, disabilities, etc), accelerated construction by social landlords does not appear to significantly boost the supply of labour.

Table 3: Stafford Borough’s Old Age Dependency Ratio (OADR)[†]

	Population 2020 Persons	Population 2040 Persons	Population Change Persons
State Pension Age	29,890	39,442	9,532
Working Age	84,548	90,936	6,388
Old Age Dependency Ratio	354	434	

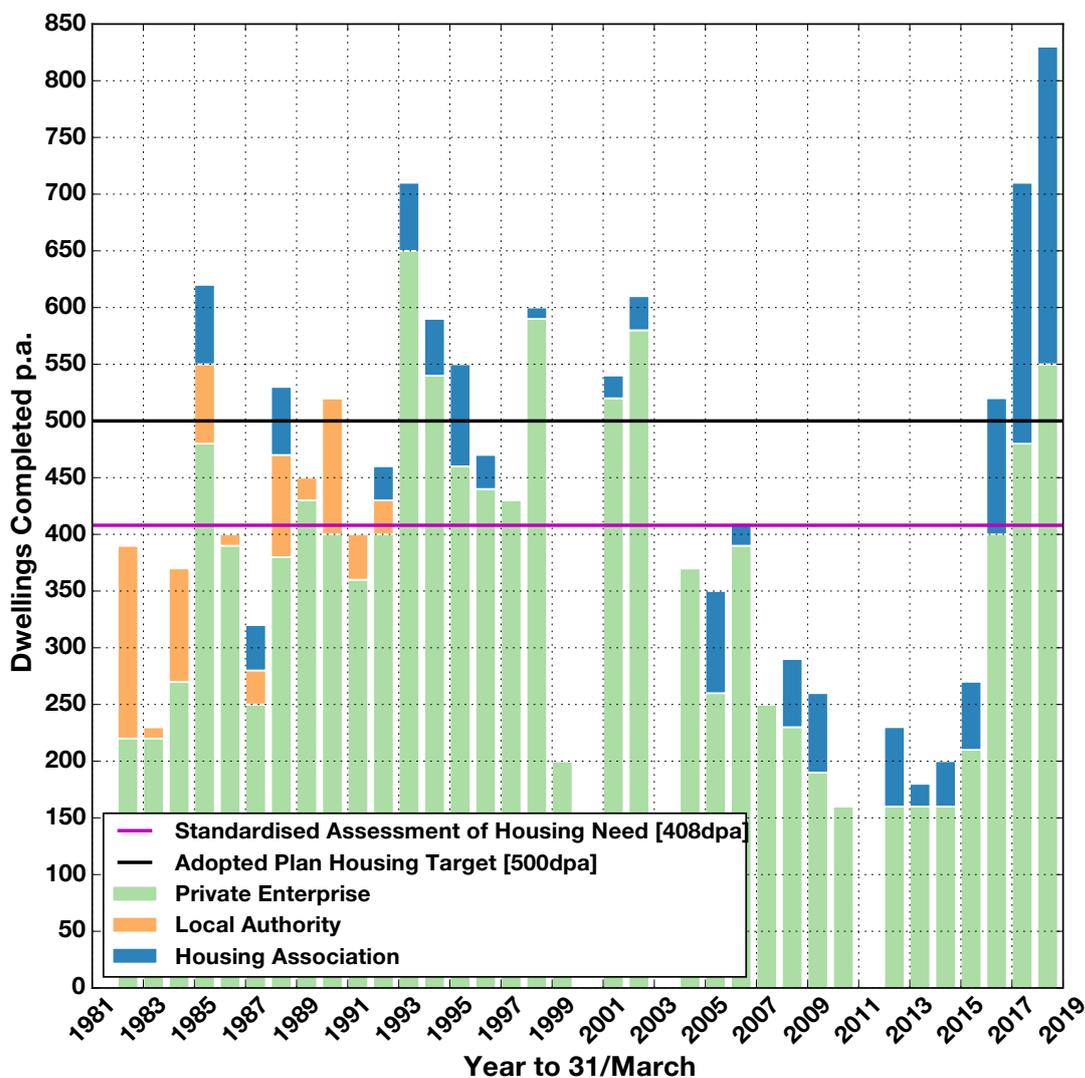
[†] OADR is the number of people of State Pension age per 1,000 people of working age

Source: ONS – Table 2: Subnational Population Projections

Housing Need & Delivery

- 6 Figure 2 below shows that since the current adopted plan's² housing target of 500dpa was established³ the Borough's population and household growth rates have fallen substantially. In contrast, neighbouring areas (with cheaper housing) have seen either constant household growth rates (Newcastle-under-Lyme) or increased household growth rates (Stoke-on-Trent). Refer Appendix C (Market Signals) for a full explanation.
- 7 Figure 1 below shows housing completions (by ownership) since 1981. Since 1981 dwelling completions have averaged 423dpa, with private sector completions only exceeding 500dpa on six occasions. This illustrates how demanding the current housing target of 500dpa is. Housing associations completed an unusually high number dwellings in the three years ending Mar/2017-19. Following the Brexit referendum, and in expectation of a slowing economy and a weaker housing market, national house builders offloaded surplus stock at a substantial discount. This is a once-off factor suggesting that future housing demand is likely to be weaker.

Appendix B Figure 1: Stafford Borough – Dwellings completed by ownership



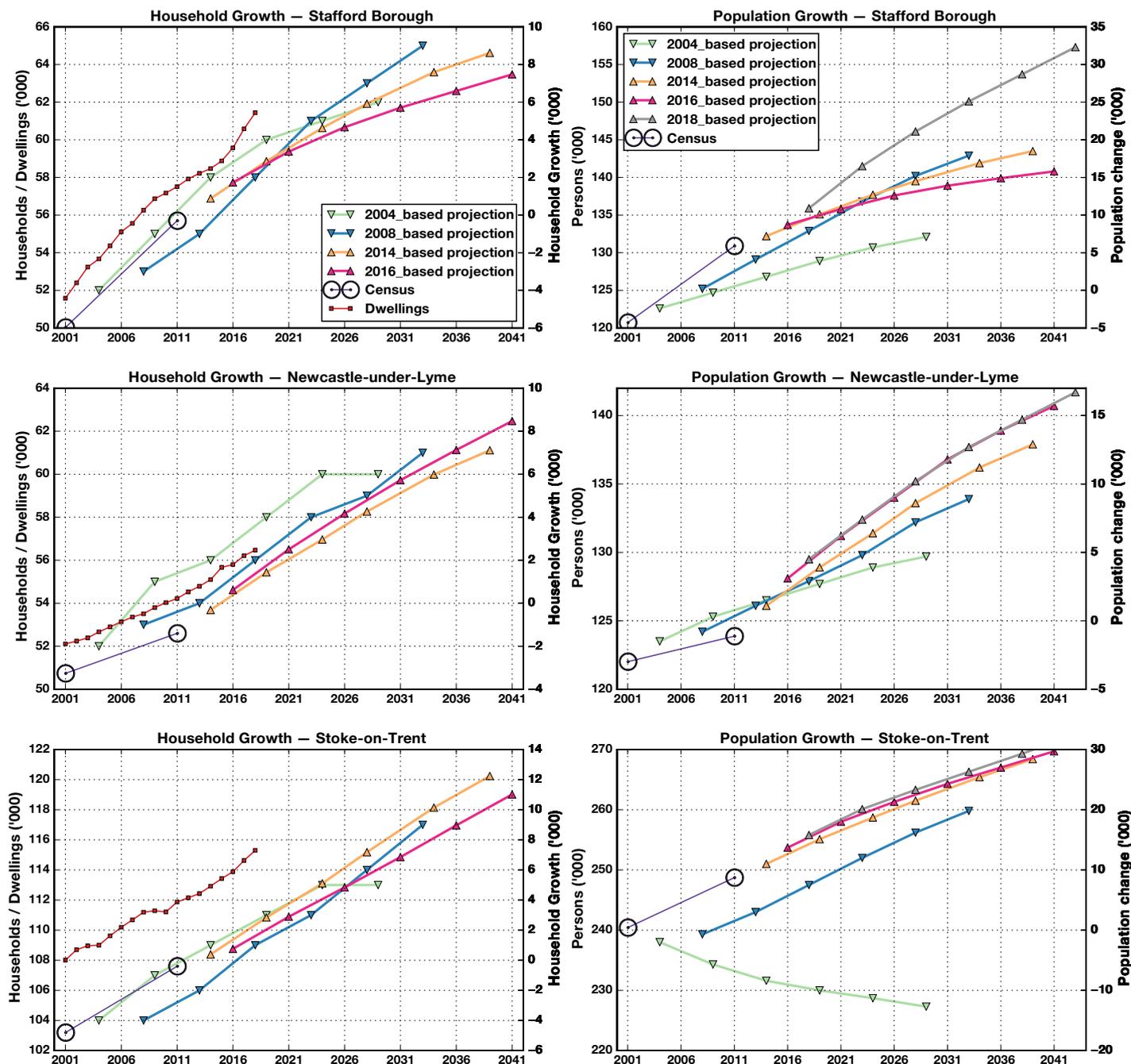
Source: ONS Live Table 253

²policy SP2

³Strategic Housing Market Assessment (HMA), 2012

8 Divergent growth trends are reflected in changing migratory patterns, with population growth slowing in Stafford Borough but rising in Newcastle-under-Lyme and Stoke-on-Trent. The Borough's high house prices (relative to wages) make it difficult to secure a mortgage (refer Appendix C Market Signals paragraphs 14, thus deterring inward migrants. At current market prices, Bank of England regulations which restrict mortgage lending apply to a larger proportion of the Borough housing stock (refer Appendix C paragraph 15, than is the case in neighbouring districts. Hence private sector demand is more constrained.

Appendix B Figure 2: Slower Household & Population growth in Stafford Borough vs. the Potteries



Source: ONS Population and Household growth projections

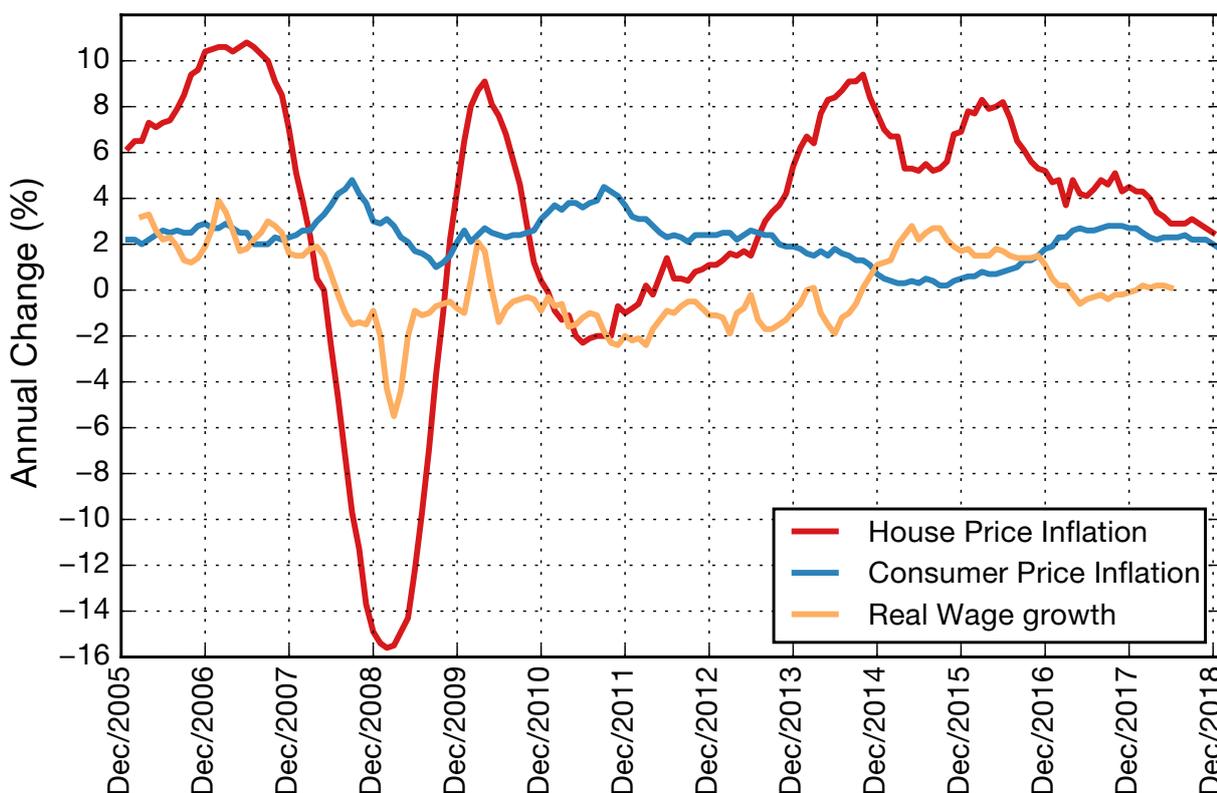
Market Signals

- 9 If the private sector is to be the dominant mechanism for delivering homes (for private ownership or as a social housing allocation) **then more attention should be paid to the laws of economics.** Specifically, unless policy makers properly interpret market signals, they will fail to appreciate the limits which the market imposes on development plan policies, e.g. house building rates.
- 10 **Summary of material in Appendix C (Market Signals):**
- (a) **House prices determine market (private sector) demand** – If house prices exceed what consumers are willing/able to pay, then inward migration will fall and so will rates of house building. The converse is also true. So, while developers may be willing to supply more homes, the capital insensitive nature of house building means that construction rates will **always** be limited by what the market can absorb.
 - (b) **The financial crises will permanently effect the housing market** – Decisive government action, following the financial crises (2008), enhanced the stability of the banking system and protected the UK economy / government finances from future shocks. Regulatory reforms resulted in banks more than doubling their capital ratios⁴ and mortgage market reforms penalised or eliminated risky lending practices (e.g. high loan to income mortgages). Currently, and for the duration of this local plan, those struggling to get on the property ladder, e.g. first time buyers and those on lower incomes, will find it very difficult to secure the finance necessary to buy a house.
 - (c) **House price differentials discourage migration to expensive areas** – This follows from the two points above. If, as a matter of policy (e.g. addressing cross-boundary unmet housing needs), a local plan chooses to accelerate inward migration and increase housebuilding, the plan must choose to (a) rely on the market mechanism and put appropriate subsidies in place to boost housing demand, or (b) choose public sector provision (e.g. Council Houses) to supply the homes which the private sector cannot.

⁴capital ratio – is the percentage of a bank's capital to its risk-weighted assets

- 11 As noted in Appendix B, housing deliveries in Stafford Borough have rarely exceeded 500dpa, a deliberate policy of allocating more land. Figure 1 below reflects the fall-out of the global financial crisis and the continuing impact on UK living standards, wage levels and house prices. It also explains why inward migration into districts such as Stafford Borough has dwindled as increasing numbers of households have been priced out of the housing market.
- 12 The aggregate impact is that a significant proportion of UK households would struggle to afford a home because their financial circumstances do not allow them to raise a mortgage large enough to buy a home. In circumstances where housing deliveries are demand constrained, supply side measures, e.g. boosting housebuilding by allocated more land, will be ineffective.

Appendix C Figure 1: House and Consumer Price Inflation relative to Real Wages



Source: ONS, Bank of England

- 13 Following the collapse of Lehman Brothers (Q3/2008) the UK government intervened to protect the banking system and to limit the depth and duration of the economic downturn. Through a process of *quantitative easing* interest rates were driven down to almost 0% and a vast amount of liquidity was injected into the banking system. Initially house prices (Figure 1 above, maroon line) collapsed but then rebounded strongly as the availability of cheap mortgages allowed consumers to bid up house prices. Unfortunately real wages (Figure 1 above, orange line) continued to fall – a positive real wage rate shows workers are becoming richer while negative real wage rate shows workers are becoming poorer. In 2018 the average UK worker is still about £800 p.a. poorer compared to their pre-crash wages.
- 14 The impact of these policies benefitted existing home owners, firstly because the value of their homes were driven up and secondly because of their disposable income increased as mortgage costs fell. There were significant adverse impacts for younger workers (especially first-time buyers), firstly real wages fell and continued to fall, secondly younger households had accumulated significant levels of debt (including student debt), thirdly house prices were driven beyond their reach and finally banks demanded substantially larger deposits.

15 Figures 2 and 3 below show the response of UK mortgage lenders to regulatory changes following the financial crisis (2008). In response to tougher capital requirements, banks have chosen to reduce their exposure to the UK mortgage market, cutting the number of new mortgages they issue and avoiding risky lending (e.g. high loan to income ratios). While Figure 2 shows less than 10% of UK mortgage lending had a loan to income ratio of more than 4.5, the situation in Stafford Borough (see Figure 4 below) is that median house prices are 6.75 times median income, while lower quartile house prices are 7.75 times lower quartile income. Unsurprisingly a substantial majority of new entrants into the labour market would struggle to get on the property ladder.

Figure 8: LTI multiple bands by borrower type 2007 vs 2016 (%)
 Appendix C Figure 2: Loan to Income ratios by borrower type, 2007 vs 2016 (%)



Table 1: Regulated mortgage sales in 2016 compared to 2007:

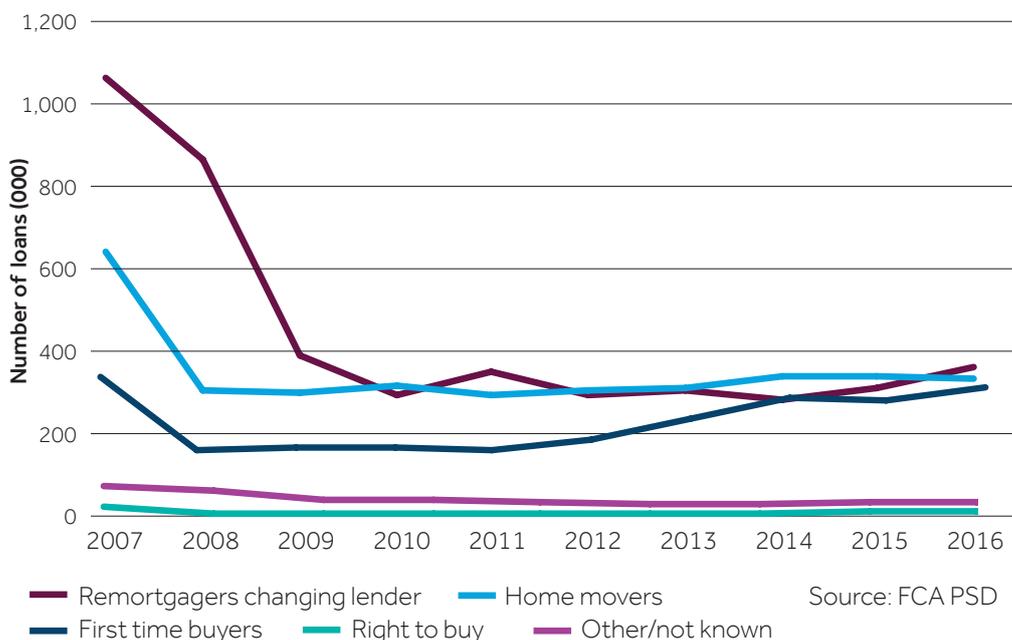
Borrower type	2007 volume	2016 volume
Remortgager changing lender	1,054,500	374,100
Home mover	646,400	348,300
First time buyer	335,800	312,500
Other	93,500	53,800
Total	2,130,200	1,088,700

Legend: <=2.5 (dark blue), >2.5=3.5 (light blue), >3.5=4.5 (teal), >4.5 (dark teal)
 Source: FCA PSD

Source: FCA PSD

Figure 1: Number of regulated mortgage sales 2007-2016

Appendix C Figure 3: Number of regulated mortgage sales 2007-2016 by borrower type

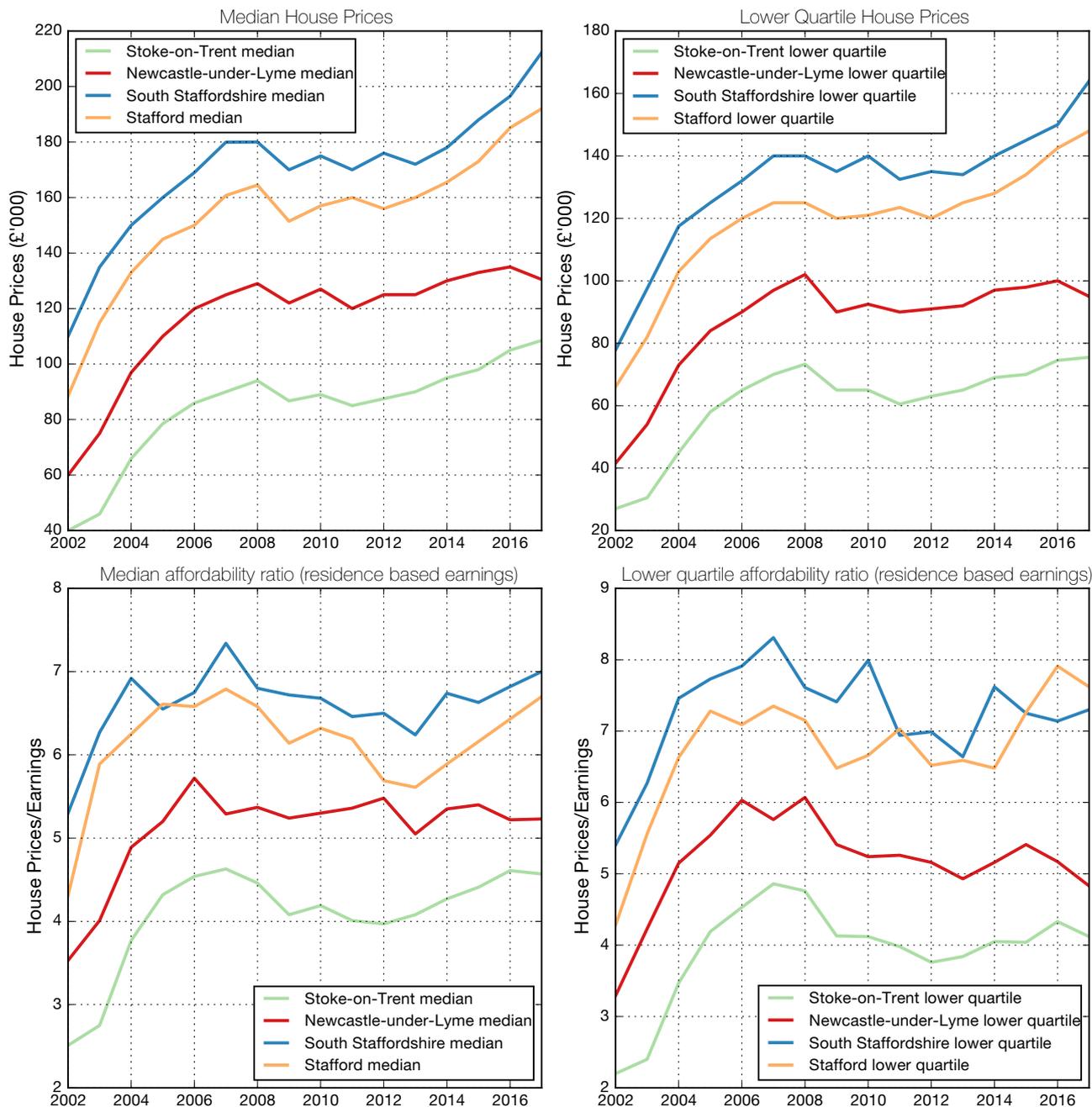


Source: FCA PSD

Decline in annual transaction volumes for each of the main mortgage borrower types from 2007 to their respective low points within the period:

16 Figure 4 below illustrates the disparity in house prices in Stoke-on-Trent and the Newcastle-under-Lyme relative to Stafford Borough. High house prices, both in absolute terms and relative to wages, are probably the dominant reason for reduced inward migration and low house building rates – as illustrated in Figures 1 and 2 above. It also explains where additional land allocations will fail to stimulate housebuilding.

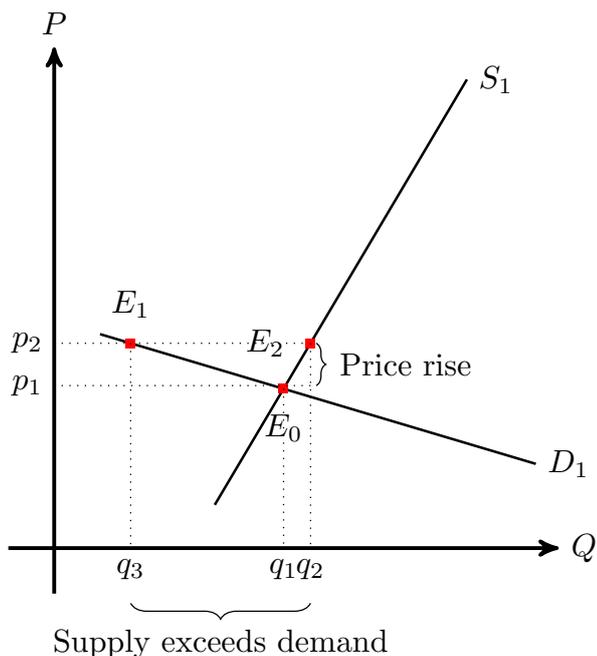
Appendix C Figure 4: Relative Affordability of houses in Stafford Borough



Source: ONS House Price tables 5a, 5c, 6a and 6c

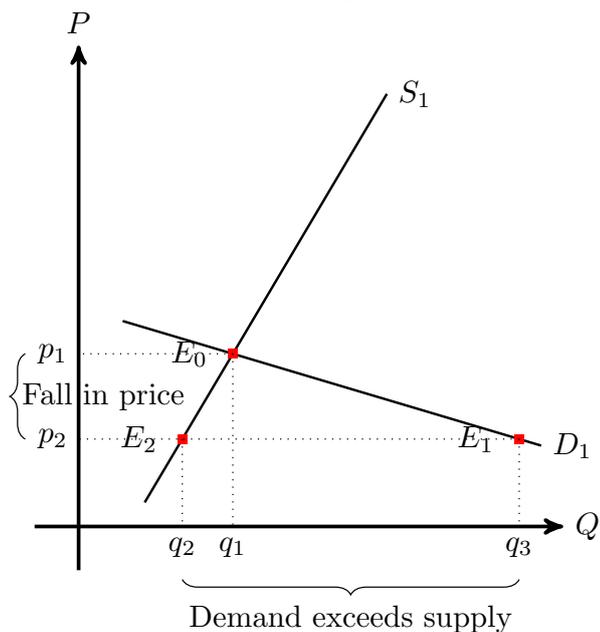
- 17 Figures 5 & 6 below illustrates how housing supply (developers) and demand (consumers) respond to a change house prices. It is a feature of the property market that a change in the prices of housing has a much bigger impact on demand than it has on supply. Economists call this price elasticity. Figure 5 reflects the current situation where new land allocations (for housing) substantially exceed market demand. Figure 6 below illustrates how a subsidy to consumers (e.g. tax deductibility of mortgage interest) or a subsidy to developers (e.g. reducing developer obligations) could boost housing supply.

Appendix C Figure 5: Elasticity of Supply / Demand to a rise in house prices



Market supply for housing (line S_1) is upward sloping indicating that developers are willing to supply more if prices rise. Market demand for housing (line D_1) is downward sloping indicating that demand for housing rises when prices fall. Supply and demand are at equilibrium (point E_0) at price p_1 and quantity q_1 . If the market price for housing was to rise from price p_1 to p_2 there would be a big fall in demand from consumers (q_1 to q_3) but a relatively small rise in supply from developers (q_1 to q_2). This highlights the limitations of allocating more land where houses are expensive (e.g. Stafford Borough) to attract migrants from areas where housing is cheaper (e.g. Stoke-on-Trent).

Appendix C Figure 6: Elasticity of Supply / Demand to a fall in house prices



Market supply for housing (line S_1) is upward sloping indicating that developers are willing to increase supply if prices rise. Market demand for housing (line D_1) is downward sloping indicating that demand for housing rises when prices fall. Supply and demand are at equilibrium (point E_0) at price p_1 and quantity q_1 . If the market price for housing was to fall from price p_1 to p_2 there would be a big rise in demand from consumers (q_1 to q_3) but a relatively small fall in supply from developers (q_1 to q_2). This suggests that with a relatively small subsidy, developers could be encouraged to maintain supply yet households are willing to buy substantially more homes (provided they can raise a mortgage).

Clerk: Liz Harrington-Jones (Mrs)

Forward Planning
Stafford Borough Council
Civic Centre
Riverside
Stafford ST15 3AQ

21 April 2020

Dear Sirs

Review of Local Plan for Stafford

Swynnerton Parish Councillors welcome the proposed Garden Village development(s) provided they are partnered with and integrated into the existing village networks, and are not detrimental to existing rural settlements. The new developments should be developed in such a way that they support the existing shops/schools/post offices, bus services etc, and should be planned to support their own facilities rather than depriving local residents of existing facilities.

The inclusion of community facilities such as pubs, meeting halls, social centres, etc is considered essential to the creation of a cohesive settlement as well as efficient and affordable transport provision. This is vital if social housing is included; it cannot be assumed that all residents will have cars, and residents should not be marooned in positions of isolation.

Existing road structures will need to be improved to cope with the additional traffic generated. Allowance will need to be made for the likely increase in commercial vehicles, as the plans for the Garden Village(s) include 40-65% employment land which suggests damage to the local environment and the possibility of increased HGV usage on rural roads.

Councillors questioned the impact of the HS2 project on the region; its effect on small settlements and the impact of the possible employment provision of the railhead near Yarnfield.

Councillors supported the protection of the Green Belt areas in the Borough, but questioned the density thresholds in villages which approved the inclusion of modern 3 storey properties. These are considered to be inappropriate in rural areas. Consideration should be given to the inclusion of adequate parking for domestic vehicles, and to the appropriate design of dwellings – a small amount of timber and a canopy over the front door is not sufficient to indicate a rural dwelling!

Yours faithfully

Liz Harrington-Jones (Mrs)
Clerk and Responsible Financial Officer to Swynnerton Parish Council



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

April 2020

About the Woodland Trust

The Woodland Trust (“the Trust”) is the UK’s leading woodland conservation charity, and wants to see a UK that is rich in native woods and trees, for people and wildlife. We aim to achieve this by restoring and improving woodland biodiversity and increasing people’s understanding and enjoyment of woods and trees.

We own over 1,275 sites across the UK covering over 23,580 hectares. We have around 500,000 members and supporters across the country. The Trust is recognised as a national authority on woods and trees and a protector of the benefits and values that they deliver for society.

We welcome the opportunity to comment on the Local Plan Review – Issues and Options consultation. This response focuses on issues relating to trees and woodland, and their contribution to the wider objectives of the local plan.

Vision and objectives

We welcome the strategic objective 3.3g that Stafford Borough should be “protected, conserved and enhanced to provide an exceptionally high quality of environmental, historic and landscape character” and the further objectives that “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” and “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” (section 3.3).

Q3A-B. Whether or not the vision is made more succinct, we strongly encourage an approach to a local plan that helps to protect what is most valued in the borough, including landscapes and wildlife habitats, by ensuring that new development is directed away from the most sensitive locations, and that new development is planned in a way which enhances the overall quality of the borough.

Q3C The Trust strongly supports having an explicit vision to respond to the climate crisis as a central function of the local plan. The Trust’s Emergency Tree Plan provides guidance for local authorities, including advice on setting tree canopy cover targets for development sites as part of the council’s action plan.

The Woodland Trust also provides guidance on local tree strategies, on planning policies to protect ancient woodland and good practice on trees in new residential developments which we encourage Stafford Borough Council to reflect in the emerging Local Plan.

Q3.F Protecting the natural environment should be a theme of the plan, especially in the context of emerging policy on biodiversity net gain.

The Local Plan should include policies that ensure the fullest protection for environmental assets, including protective buffers and the promotion of connectivity between such sites. Growth and development should be focused on less environmentally important sites, and be an opportunity to enhance their environmental quality. We recognise the threat that higher pressure for development places on the environment, and that the Local Plan should provide additional protection for valued landscapes and designated sites.

Q4.A b) Tree planting should be included as a climate resilience measure in new developments.

We welcome the proactive approach with policies that seek to reduce the generation of carbon emissions, and to address the impacts of climate-change through mitigation. However, we are disappointed that no specific mention is made of trees, woodland and green infrastructure in general in this context.

As has been recognised by the UK Committee on Climate Change, trees play an invaluable role in carbon sequestration; they also contribute to climate resilience and mitigation, contributing positively to flood resilience, and the provision of shelter and shade.

To maximise the climate change benefits of trees, we recommend that the Local Plan include a target for tree canopy cover of at least 20 per cent, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease, and by new planting to support green infrastructure.

In addition to policies supporting renewable energy and sustainable water use, we recommend a requirement for at least one new tree, or equivalent soft landscaping, for each new dwelling. We would further encourage the specification where possible of UK sourced and grown tree stock, to support biodiversity and resilience. Useful guidance on the integration of tree planting into new designs is available in the Woodland Trust publication, *Residential developments and trees - the importance of trees and green spaces* (January 2019).

Q9.A The Trust encourages having a separate policy on Green and Blue infrastructure and would be happy to contribute to its development.

Q9.C The Trust strongly supports explicit protection for ancient woodland as a designated habitat.

We recommend inclusion in the local plan of specific policy to protect ancient woodland and veteran trees, in line with the National Planning Policy Framework (NPPF) (paragraph 175c). The following model wording is recommended.

Ancient woodland, veteran trees and development

- i. *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.*
- ii. *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.*
- iii. *Ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland. The protection of the whole habitat is necessary even though tree cover may be comparatively sparse. Development on open space between trees in an area of ancient wood pasture or historic parkland should not be permitted.*

Further guidance is available in the Trust publication: *Planners' manual for ancient woodland and veteran trees* (2019).

Q9.E The Trust strongly supports development of a Tree Strategy and refers the Council to the guidance produced by the Trust.

The Trust recommends adopting a policy for tree replacement to compensate for loss of existing trees based upon the size of the trees to be lost.

Number of replacement trees	Trunk diameter of tree lost to development <small>(cm measured at 1.5 metres above ground level)</small>
Fewer than 15	0-1
15-19.9	1
20-29.9	2
30-39.9	3
40-49.9	4
50-59.9	5
60-69.9	6
70-79.9	7
80+	8

Source: Woodland Trust *Local Authority Tree Strategies* (July 2016).

We also recommend specifying native species, ideally from UK & Ireland sourced and grown stock to support biosecurity.

Q9.M-9.N

We welcome the commitment to providing parks and open spaces and recognition of their benefits for health and biodiversity.

While all parks have potential to help deliver health benefits, those that are wooded have some definite advantages. Parks with trees are used more than those without. They are usually attractive and can be designed and managed to ensure people feel safe in them. Because of their structure, woods also have the advantage that they can accommodate larger numbers of people without seeming crowded, while also filtering noise and air pollution.

Tree planting can also help address health inequalities, the health gap between communities with differing economic conditions. Access to green space is not equally distributed across

the population. More affluent areas and people in higher socioeconomic groups have larger amounts and greater access to green space compared to more deprived areas. Inclusion of existing and creation of new green space can help reduce these inequalities. In those areas where there are a greater proportion of green spaces, income-related health inequalities are lower.

We recommend an approach that seeks to retain existing trees within a development site and promote the planting of new trees wherever possible. Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide.

The Trust recommends policies that seek to see a new tree or equivalent soft landscaping provided for every new home, either on site or at a suitable council-identified location. We also recommend targets for access to woodland and the natural environment.

Natural England's Accessible Natural Green Space Standard recommends that all people should have accessible natural green space:

- Of at least two hectares in size, no more than 300m (five minutes' walk) from home.
- At least one accessible 20-hectare site within 2km of home.
- One accessible 100-hectare site within 5km of home.
- One accessible 500-hectare site within 10km of home.
- A minimum of one hectare of statutory local nature reserves per 1,000 people.

The Woodland Trust has developed a Woodland Access Standard to complement the Accessible Natural Green Space Standard. This recommends that:

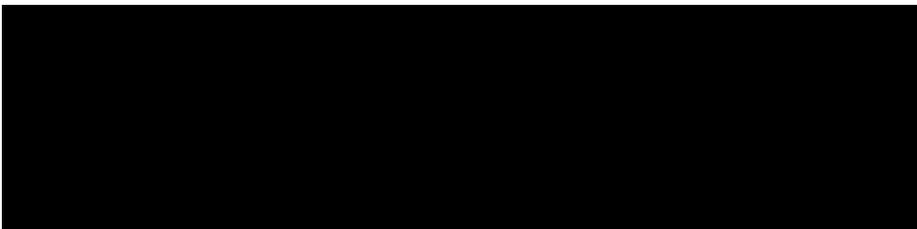
- That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
- That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.

Further guidance is available in the Trust's publication *Residential developments and trees - the importance of trees and green spaces* (2019).

We welcome opportunities to work with Stafford Borough Council officers and members and to contribute further to the emerging Local Plan and to your work on trees and woodlands.

April 2020

Bridget Fox Regional External Affairs Officer



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

Part A: Your Details (Please Print)		
Please ensure that we have an up to date email address wherever possible, or postal address, at which we can contact you.		
	Your Details	Agent’s Details (if applicable)
Title	Mr	
First Name	John	
Surname	Fraser	
E-mail address		
Job title (if applicable)	Parish Clerk	
Organisation (if applicable)	Yarnfield and Cold Meece Parish Council	
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.

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	5G	Other	
2. Please set out your comments below					
<p>The Parish Council do not consider the garden community would be helpful in determining the approach to satisfying Stafford Borough’s future housing and employment land requirements?</p> <p>The garden community concept is about a new way of living not just a massive-scale housing estate.</p> <p>Therefore you would need to be sure that the land is safe and ready for development and that the site is easily and safely accessible by road for developers and once built for the residents. This in itself will require massive investment before any income is realised.</p> <p>It will require an enabling infrastructure, for example:</p> <ul style="list-style-type: none"> - Connection to towns and cities via reliable, affordable rail and bus networks - Guaranteed employment on or just off site - Employment to match the qualifications, training and aspirations of the new residents - Schools and pre-school provision - Sustainable energy e.g. on-site solar panels and wind turbines - Energy efficient building from scratch - Community charge points for electric cars - knowing from experience that the number you plan for will not be enough - Landscaping for leisure - Walkways and cycleways for access and leisure - within and outwith the settlement itself - Community allotments - Water reuse/rainwater collection - Community facilities such as shops, restaurant/cafe, pub, space for leisure and sporting activities suitable for all ages and abilities including young people, working people, people with disabilities. These are likely to need start-up funding and/or grants to ensure sustainability <p>Until you have locked down funding for these enablers it is premature to speculate about the garden communities as a viable planning option.</p> <p>A garden community is not feasible without absolutely guaranteed financial support from government and the county council.</p>					

Part B: Your Comments					
<i>Please complete a new Part B for each representation you wish to make.</i>					
Name		Organisation			
Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5H	Other	
2. Please set out your comments below					
<p>Potential Growth Options</p> <p>The Parish Council is concerned that:</p> <p>Option 3 is to disperse development across the new settlement hierarchy. The main problem for us with this is the estimate that Stone would take 10-20% of the new housing and that would seem unreasonable given the expansion over the last 10 years.</p> <p>Option 4 and 5 the focus on new Garden Communities is not considered to be acceptable to the Parish Council.</p> <p>Option 6 provides the best solution to the growth requirements building on existing transport arrangements</p>					

Which part of the New Local Plan 2020-2040 "Issues and Options" consultation paper does this representation relate to?					
Section		Paragraph		Table	
Figure		Question	5I	Other	
2. Please set out your comments below					
<p>The Parish Council's view is that the development of a Garden Community although this sounds excellent as a concept, there are serious risks in pursuing this further in the current economic climate:</p> <ul style="list-style-type: none"> - neither planning authorities nor private house building companies are going to spend the real money that would be needed on the infrastructure for self-sufficiency and sustainability, - for this concept to work it would need guaranteed financial and political support from central government, county councils and private industry. This would require a level of co-operation and central planning that we have not seen in peacetime. For example, new train and bus networks would need to focus on local, daily travel and they would need to be subsidised - energy self-sufficiency would need subsidising - appropriate employment opportunities would need to be secured before housing was planned and designed. <p>If these enablers are not secured, then the Garden Communities would simply be mammoth</p>					

housing estates and that would not provide the quality of life that is implicit in the aspiration.

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

Section		Paragraph		Table	
Figure		Question	5J	Other	

2. Please set out your comments below

The explanation of the options is insufficient to enable the Parish Council to take a view on the preferred option.

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

Section		Paragraph		Table	
Figure		Question	5Q	Other	

2. Please set out your comments below

The Parish Council support the methodology used to define settlement boundaries as a fundamental approach to protecting the integrity existing settlements. It also recognized the preservation of green belt.

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



Our Ref: SBC/IO

Please ask for: Ed Fox

29th April 2020

[Redacted]
[Redacted]

Alex Yendole
Planning Policy Manager
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AG

South Staffordshire Council response to the Stafford Borough Local Plan 2020-2040 Issues and Options consultation document

Dear Alex,

Thank you for providing South Staffordshire Council with the opportunity to comment on Stafford Borough Council Issues and Options Consultation (February 2020). This letter follows the Council’s interim response to the consultation sent to you on 23rd March 2020. The response has now been through the Council’s constitutional process, and following consideration by Members, remains unchanged. Therefore, please accept this letter as the Council’s final response to the consultation.

South Staffordshire Council supports the broad approach within the Stafford Borough Issues and Options document. Should the Borough Council decide to adopt a level of growth greater than that identified through the Objective Assessment of Needs it is suggested that this would present an opportunity for Stafford Borough Council to make a direct contribution towards meeting the shortfall of housing need identified within the Greater Birmingham Housing Market Area (GBHMA). Such an approach would be consistent with national policy as identified within the National Planning Policy Framework paragraph 137 which promotes a sequential approach to exploring potential development opportunities prior to the release of Green Belt sites. This approach includes ‘discussions with neighbouring authorities about whether they could accommodate some of the identified need for development’. The potential scale of the housing





supply requirements and shortfall within the GBHMA has been evidenced through the adoption of Birmingham Development Plan 2031 and the subsequent GBHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the Duty to Co-operate requirements for Stafford Borough Council to actively consider a contribution towards meeting the GBHMA shortfall as part of the current local plan review process.

We trust that the comments are useful and look forward to ongoing discussion with you on cross boundary issues throughout the preparation of our respective Local Plans.

Yours sincerely



Ed Fox
Strategic Planning Team Manager

