

# Stafford Borough Local Plan 2020-2040

## Issues and Options Consultation Document February 2020



**Stafford**  
BOROUGH COUNCIL

Cover image: St Mary's Church, Stafford

CONSULTATION

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## Section 1 Introduction

### What is the New Local Plan?

- 1.1 The new Stafford Borough Local Plan will replace the Plan for Stafford Borough 2011-2031 adopted in June 2014 and Part 2 of the Plan for Stafford Borough adopted in January 2017. The preparation of the New Local Plan will consider the opportunities and challenges presenting themselves to the Borough and will guide the scale, location and nature of new development in the Borough area over the Plan period 2020-2040. In doing so, assuming adoption of the Plan in 2022, the New Local Plan will provide a plan horizon of at least 15 years and will describe what changes will occur and how places will be shaped in the future.
- 1.2 The purpose of the new Local Plan is therefore several-fold. It will:
- set out a refreshed vision for the development of the Borough from 2020-2040;
  - highlight the key issues to be addressed;
  - provide objectives to guide continued growth and policies so that new development meets local needs in line with national policy set out through the National Planning Policy Framework (NPPF);
  - provide a strategy and policy framework for the delivery of development and the decision-making process for future planning applications in the Borough;
  - identify the scale and location of development;
  - describe how the development will be implemented.

### Responding to Government

- 1.3 New planning regulations<sup>1</sup> were published by Government in late 2017 that required local authorities to review Local Plans at least every five years from the date of their adoption. Local Authorities will need to carry out an assessment of whether a Local Plan remains relevant and effectively addresses the needs of the local community, or whether policies need updating. Having carried out this assessment authorities must decide:
- that one or more policies do need updating, and update their Local Development Scheme to set out the timetable for updating their plan, and then update their plan; or
  - that their policies do not need updating, and publish their reasons for this decision.

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<sup>1</sup> The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017 (<http://www.legislation.gov.uk/uksi/2017/1244/contents/made>)

- 1.4 In response to the new regulations, an assessment of the adopted Plan for Stafford Borough 2011-2031, including Part 2, was undertaken. Key factors that needed to be considered with respect to the current local plans were:
- Progress on the delivery of development set out in the Plan for Stafford Borough together with Part 2, and an evaluation of the strategy set out in the plan;
  - an updated Government-proposed standardised methodology for the calculation of local housing need first introduced by the 2017 Housing White Paper<sup>2</sup> and then consolidated into the February 2019 revised National Planning Policy Framework (NPPF)<sup>3</sup> and Planning Practice Guidance (PPG)<sup>4</sup>.
- 1.5 The NPPF and PPG include references to the standard housing methodology. More detail is set out in section 8 of this consultation document on the current issues that need to be considered with respect to any proposed housing need for Stafford Borough.

### **How will the Local Plan be prepared?**

- 1.6 In considering the preparation of the New Local Plan this section will describe the timetable for the Plan's preparation and activity to date (including the results of the "Scoping the Issues" consultation conducted in July to September 2018) and what the next stages will be. Subsequent sections will describe in more detail the issues facing Stafford Borough and what potential options might be available. In doing so the document will pose a number of questions for your response via this consultation.
- 1.7 The preparation of a New Local Plan must follow a number of key stages which are set out in the latest Local Development Scheme. This is to ensure that local people, businesses and other stakeholders are fully engaged in the process, as detailed through the Statement of Community Involvement. The Local Plan will be based on robust evidence including focussed technical studies, an iterative Sustainability Appraisal process throughout the plan's preparation, consultation responses and the outcomes of other stakeholder engagement. The New Local Plan will be independently examined by an Inspector to assess whether it has been prepared in accordance with legal

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<sup>2</sup>Housing White Paper (2017)

(<https://www.gov.uk/government/collections/housing-white-paper>)

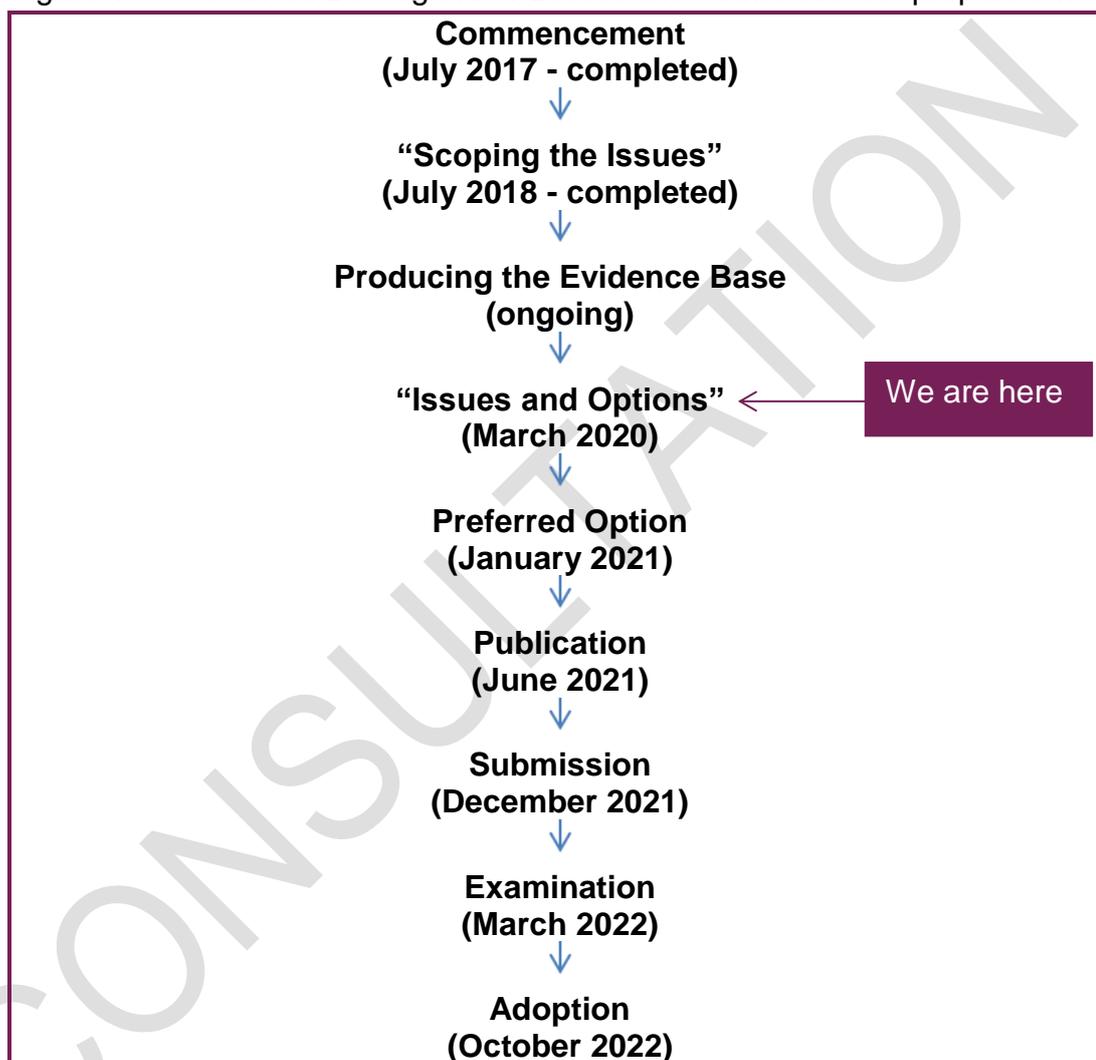
<sup>3</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/79764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/79764/NPPF_Feb_2019_web.pdf)

<sup>4</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

and procedural requirements, and whether it is sound. Plans are ‘sound’<sup>5</sup> if they are:

- a. positively prepared;
- b. justified;
- c. effective;
- d. consistent with national policy.

Figure 1 Stafford Borough New Local Plan – Timetable for preparation



Based on Stafford Borough Local Development Scheme – adopted by Stafford Borough Council’s Cabinet 5<sup>th</sup> September 2019.

- 1.8 The key stages of preparing the Local Plan are summarised above (Figure 1). However it is important to note that, due to the complex nature of the work, the programme will be kept under regular review.

<sup>5</sup> NPPF para 35

## What has happened to-date?

### Scoping of Issues consultation

- 1.9 Following the Local Plan review in July 2017 a Scoping of Issues consultation was conducted between 18 July and 18 September 2018. A total of 69 responses were received which encompassed a total of 335 individual representations. The full responses and the summary spreadsheet form part of the evolving evidence base to the New Local Plan process.
- 1.10 Panels 1 to 6 below provide a topic-by-topic summary of the recurring and key responses to the “Scoping the Issues” consultation. It is intended to guide and assist future work on the Local Plan. Further, as the evolving evidence base is assessed further issues may emerge.

#### Panel 1

##### Scoping the Issues Consultation – Vision and Objectives

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

#### Panel 2

##### Scoping the Issues Consultation – Economic Development

- Demand for focus to be placed on delivering retail in Stafford Town Centre, rather than out-of-town retail parks.
- Need for rural economic development
- Demand for greater support to be given to independent businesses across the borough.
- Calls to diversify industry in the borough, with restrictions on the development of storage and distribution facilities and work to increase employment opportunities in renewable energy, data and health services.
- Support existing businesses.

**Panel 3**  
**Scoping the Issues Consultation – Delivery of Housing**

- All homes provided to be attractive and of high quality.
- Development to be appropriate to the needs and character of the locality. Where appropriate local builders, self/custom build should be encouraged and facilitated.
- Focus should be given to the delivery of housing stock which provides a mix of housing types and tenures. In particular, focus should be given to the development of affordable, single occupancy and specialist accommodation.
- Homes for all to ensure everyone has a place to live and to reduce any potential for homelessness
- Consistent demand for more bungalows to enable elderly people to continue residing in their existing communities, whilst releasing their properties through downsizing.
- Support for the improved accessibility and provision of housing for older people and other groups with special needs.
- Support for allowing development in rural areas. Benefits cited included that it would:
  - Help to increase the sustainability of rural settlements,
  - Enable “downsizing” by older people whilst allowing them to remain in their community of choice, as well as providing homes for younger people
  - Support community services and facilities in rural settlements
  - Suggestions that development in rural areas should prioritise regeneration of brownfield land, ensuring sustainable development.
  - Mixed responses regarding the adoption of density thresholds. Whilst some argue that allocating density thresholds is restrictive, others suggest that it is a necessary tool, and prevents residential areas from becoming overly cramped.
  - Higher densities to be permitted where there is access to sustainable transport modes
  - Suggestions that design standards in the area should be raised, with an increased interface between the council and the local design panel.
  - Mixed reactions to a self build policy requiring a set number of self-build plots to be delivered on schemes of a certain size, with some concerns raised over a blanket policy approach and how this could affect viability. Local residents though tend to see self-build as a desirable activity in the area, with some suggesting that such projects positively contribute to the housing stock.

**Panel 4**

**Scoping the Issues Consultation – Social infrastructure**

- Demand for Multi Use Games Areas to be developed across the borough.
- Consistent demand for the importance of public health and well-being to be acknowledged throughout the Local Plan – e.g. through all residents having access to areas of green space, and safe walking and cycling paths.
- General demand for the increased provision of healthcare facilities.
- A general demand for the provision sufficient educational facilities.
- Protect existing cultural facilities and enhance provision.

**Panel 5**

**Scoping the Issues Consultation – Natural and Historic Environment**

- A consistent support for the protection and enhancement of the natural environment and associated biodiversity assets of the Borough.
- Support for the protection of the historic environment
- Support for the Green Belt
- Support for the designation and protection of Local Green Spaces which are important to local communities.
- Local Green Spaces, Cannock Chase Area of Outstanding Natural Beauty (AONB) and other areas are seen as enhancing the environment and, as such, should be protected and conserved.

**Panel 6**  
**Scoping the Issues Consultation – Transport and Communications Infrastructure**

- Faster broadband to be provided in all areas across the borough for business and residents, as standard.
- Improved sustainable transport with better bus services to be provided across the borough, including in rural areas.
- Requests for improved highways connecting the east and west of Stafford.
- A consistent request for all new development to be serviced by necessary highways infrastructure.
- Support for the increased provision of Electric Vehicle Charging Points throughout the borough.
- A consistent demand for more car parking facilities with some also mentioning the need for additional lorry parking in the Borough.
- Suggestion that Canal Facilities and New Marinas policy is carried forward with amendments to enable residential moorings
- Demand for the creation and enhancement of new and existing walking and cycle paths, to create an extensive network of pathways throughout the borough.
- Enhancement of Rights of Ways to improve connectivity for walkers, riders and cyclists.

**Settlement Assessment consultation**

- 1.8 Alongside the Issues and Options a further consultation in respect of the Settlement Assessment was conducted between 18 July and 18 September 2018. A total of 31 responses were received which encompassed a total of 73 individual representations. The full responses and the summary spreadsheet form part of the evolving evidence base for the Local Plan process.

**Panel 7****Settlement Assessment Consultation****Settlement hierarchy**

- The proposed settlement hierarchy and categorisations was welcomed.
- General support for the provision for proportionate growth within all settlements (including those in rural areas) to enable natural growth and improved sustainability of those settlements.
- Some argument made against any development in smaller settlements without the provision of appropriate infrastructure and services (especially transport, health, education, employment) since such development is not sustainable.
- Reliance on small sites in rural areas argued to limit opportunities for appropriate infrastructure/services provision and limit the provision of affordable housing
- Stafford to continue in its principal settlement role.
- Settlement hierarchy should be reviewed to recognise the impact on Stone by the HS2 proposal.

**Settlement boundaries**

- Argument made that by permitting development solely in settlement boundaries, buildings that were previously used for retail / other services or employment uses can be lost to housing causing a decline in the sustainability of settlements.
- Concern raised about the impact of expanding Stone settlement boundary resulting in ill-defined town / countryside edges

**Supporting Infrastructure**

- Support for:
  - the delivery of housing where served by appropriate highways infrastructure
  - where served by transport nodes the delivery of housing at higher densities

**Methodology, perceived accuracy and other evidence**

- Suggestion that the methodology should allow flexibility in its assessment and categorisation of settlements in order to recognise the role of settlements that fall short of the threshold numbers, but contain services and facilities akin to larger settlements.
- Suggestion that all smaller settlements should be included in the settlement assessment
- As in all Settlement Assessments a large number of comments were made querying the reasons for inclusion, exclusion or ranking of individual settlements. Since the consultation, as part of the cleansing of the evidence base, this data has been revisited so that it reflects recent changes.
- The Environment Agency has provided details of potential flooding issues for all settlements.

- 1.7 Panel 7 (above) provides a summary of the recurring and key responses to the “Settlement Assessment” consultation. It is intended to guide and assist future work on the Plan. Further, as the evolving evidence base is assessed further issues may emerge.
- 1.8 A significant number of responses in the Settlement Assessment consultation repeated “Call for Sites” submissions in order to confirm specific sites’ availability. Whilst such submissions are not reflected in Panel 7 they have been noted in order to ensure that these sites are appropriately considered.

### Evidence gathering

- 1.9 Stafford Borough Council is in the process of gathering a wide range of evidence to support the New Local Plan and provide a firm basis for the development of its strategy and constituent policies. Table 1 describes the studies that have been commissioned at the time of this consultation.

Table 1 Studies commissioned to support Stafford Borough Local Plan 2020-2040

Study title	Status
Sustainability Appraisal	Ongoing at each stage
Habitats Regulations Assessment	Ongoing at each stage
Consultation responses	Ongoing at each stage
Economic and Housing Development Needs Assessment	Published 8/1/2020
Town Centre Capacity Assessment for Stafford Borough	Published 8/1/2020
Strategic Development Site Options study	Published 8/1/2020
Stafford Borough Nature Recovery Network	Published 8/1/2020
Settlement Assessment and associated profiles	Published 18/7/2018
Strategic Housing and Employment Land Availability Assessment	Published 8/1/2020
Indoor Sport Facilities and Playing Pitch Strategy	Published 16/10/2019
Strategic Flood Risk Assessment	Published 20/11/2019

- 1.10 Further, as the Local Plan progresses a range of other studies will need to be initiated at the appropriate stage. These include, for example, an Infrastructure Delivery Programme and a Community Infrastructure Levy (CIL) Viability Study.

#### Question 1.A

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

**Question 1.B**

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

**How are communities and key stakeholders going to be involved?**

- 1.11 In preparing a new Local Plan, the Council is required by legislation to produce a Statement of Community Involvement (SCI). The SCI sets out the how and when the Council will carry out community engagement and consultation with the general public and key stakeholders when preparing the New Local Plan. This includes making consultation documents available on the Council's webpage, at the Civic Offices and in all of the Borough's libraries. A Stakeholder Engagement Plan<sup>6</sup> is published alongside this document.
- 1.12 All activities used for engagement and consultation, together with how this has been used to develop the Plan at each stage, will be recorded in the Local Plan - Consultation Statement, which will be submitted to the Inspector for consideration as part of the examination process. This document will be published at each stage of preparing the Local Plan so that people can see how their contribution is helping to shape the Plan.

**How will the Local Plan relate to Plans by neighbouring authorities?**

- 1.13 The Council is working collaboratively with neighbouring authorities, on an on-going basis, to ensure that the Local Plan takes into account cross border implications and strategic planning issues. This engagement is known as Duty to Co-operate. Where necessary, as the new Local Plan progresses, Statements of Common Ground will be developed and agreed with neighbouring authorities.

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

- 1.14 Undertaking a Sustainability Appraisal of the Local Plan is an essential part of the plan making process. The Sustainability Appraisal must address the legal requirements of the EU Directive (2001/42/EC) known as the Strategic Environmental Assessment (or SEA) Directive. A failure to undertake the Sustainability Appraisal process can expose the Plan to legal challenge.
- 1.15 The Sustainability Appraisal being undertaken for the new Local Plan sits alongside other appraisal processes, including a health impact assessment to

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<sup>6</sup> <https://www.staffordbc.gov.uk/new-local-plan->

deliver Health in All policies, a community / equalities impact assessment, and a Habitat Regulations Assessment as required under the Conservation of Habitats and Species Regulations 2010 (amended).

- 1.16 The first stage in the Sustainability Appraisal process for the new Local Plan was the preparation of a Scoping Report. The Borough Council sought views on the Sustainability Appraisal Scoping Report during a seven week consultation period from 19 July until 6 September 2017. In due course, as the Plan objectives, options and policies are prepared these will be assessed through Sustainability Appraisal reports and subject to consultation.

### **What is the status of the Plan for Stafford Borough and other planning documents now that the Council is preparing the new Plan?**

- 1.17 For the purposes of making planning decisions on planning applications, 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 that have been made / adopted, will be used as the statutory development plan for the area until the new Local Plan is adopted. At the time of the preparation of this document five Neighbourhood Plans within Stafford Borough had been made (Barlaston, Colwich, Eccleshall, Gnosall, and Hixon).

### **Further Information**

#### **How can I have my say on this consultation document?**

- 1.18 Consultation on the new Local Plan – “Issues and Options” will take place between Monday 3 February 2020 and Tuesday 31 March 2020. Please provide any responses by **12 noon on Tuesday 31 March 2020**.
- 1.19 We strongly encourage responses to be made using the pro-forma available on the council’s website at <https://www.staffordbc.gov.uk/forward-planning-consultations> and emailing completed forms to [forwardplanningconsultations@staffordbc.gov.uk](mailto:forwardplanningconsultations@staffordbc.gov.uk)
- 1.20 Alternatively, if you choose to use e-mail or letter please identify the question, paragraph or issue number to which your comments refer. To send responses please use the following address:

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

### **How will my comments be used?**

- 1.21 We will acknowledge receipt of your comments and fully consider responses for the next stage of the plan-making process. Please note that the Council will not engage through individual correspondence. All comments received will be published on the Council's website in accordance with the General Data Protection Regulations (May 2018).

### **Protecting Your Privacy**

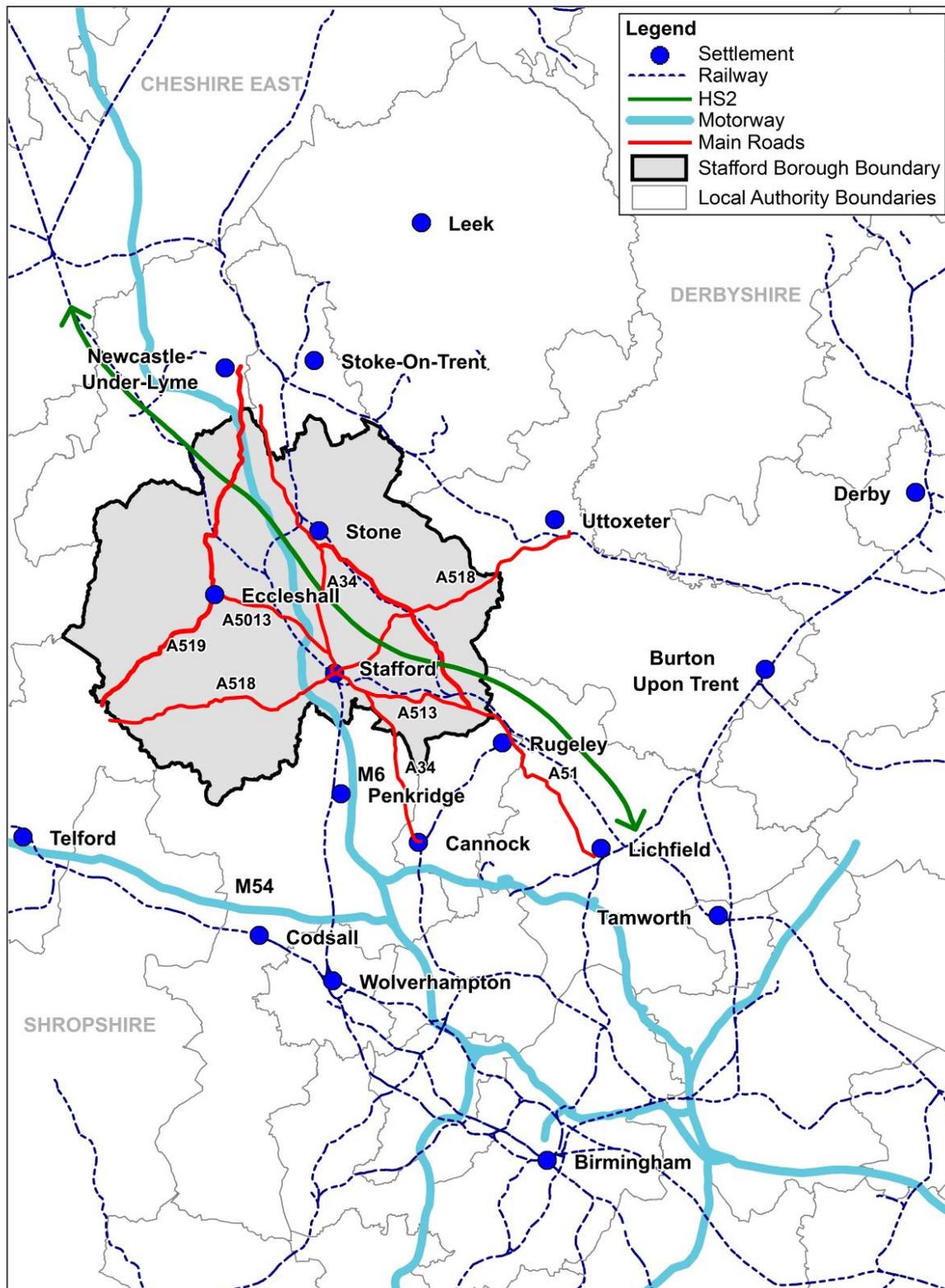
- 1.22 We believe you should always know what data we collect from you and how we use it, and that you should have meaningful control over both. As part of our ongoing commitment to transparency, and in relation to the new General Data Protection Regulations (May 2018), we have updated our Privacy Policy.
- 1.23 We will only use your personal information to send you information on the Local Plan and associated planning policy matters. You can find information about how we handle your personal data by visiting [www.staffordbc.gov.uk/privacynotices](http://www.staffordbc.gov.uk/privacynotices) and if you have any queries or would like to unsubscribe from receiving information please contact the Forward Planning section using the details above.

## 2. A Spatial Portrait of Stafford Borough



M & S Foodhall, Stone

## Section 2 A Spatial Portrait of Stafford Borough



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- 2.1 Stafford Borough is centrally located within the County of Staffordshire within the West Midlands Region. It lies between the North Staffordshire conurbation to the north, comprising of Stoke-on-Trent and Newcastle-under-Lyme, and the Birmingham City Region to the south.
- 2.2 The Borough is predominantly rural in nature covering approximately 230 square miles. It has two main town centres (Stafford and Stone) that act as hubs to the rural hinterlands. The Borough is very well connected with excellent transport links to the rest of the Country. Although the Borough is relatively self-contained, there are key economic linkages with the North Staffordshire Conurbation and the Birmingham City Region.

### The Population of the Borough

- 2.3 135,880 people<sup>7</sup> currently live in the Borough and this is expected to grow by around 8.5% between 2014 and 2034 leading to an increased demand on services and facilities, and the need to provide additional quality housing and employment opportunities. In particular, there is projected to be a decline in those aged 40 to 60 (a loss of 4,225) but a significant increase in the over 60's of 12,460 (33%). The majority of the population live in the larger towns of Stafford and Stone (61%) but a significant number live in smaller market towns, rural villages and hamlets (39%).

### Housing

- 2.4 There are approximately 58,700 household spaces in the Borough which are primarily made up of houses and bungalows (87%), whilst flats comprise only 13%. Detached properties are most prevalent (37% of the total stock) and this is higher than Staffordshire as a whole (33%) and the West Midlands Region (24%). In the rural areas a very high proportion of properties are detached, particularly in the rural west and east (60%).
- 2.5 The majority of properties are owner-occupied (72%), which is the same as Staffordshire County (72%) but higher than the regional average (65%). Private rented accommodation comprises 13% of the stock and 14% is social rent. Owner-occupation dominates the rural areas. There were 1,589 vacant properties in the Borough in 2018 (source: CLG) and 745 were classed as long term vacant; long term vacancy rates in the Borough have experienced a trend of gradual decline over the last 10 years from 2.5% in 2006 to 1.1% in 2017 (this compares to 1% nationally in 2017).

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<sup>7</sup> 2018 Mid Year Estimate

- 2.6 The condition of the housing stock is relatively average in the Borough with around 23% of homes having a category 1 hazard (a serious and immediate risk to a person's health and safety); this is in line with the national average. Overcrowding is relatively low at 3.8% of the total stock but fuel poverty is prevalent; 13.2% of households are fuel poor (the England average is 10.9%). The worst housing conditions are in rural areas.
- 2.7 House prices increased between 1995 and 2018 in the Borough, with a notable steep increase between 2001 and 2006. There was relative stability between 2007 and 2013 and since then they have crept upwards. Affordability ratios (average income to house price) are lower in the Borough (6.82) than England as a whole (8.0), however 6.82 is still concerning and the affordability ratio is increasing over time indicating affordability issues in the Borough.
- 2.8 Average rents in Stafford Borough are £585 per month (median rent as at September 2017), this is slightly higher than the Staffordshire average (£575 per month), but overall rental values in the Borough are 15% below the national average.

### **The Economy**

- 2.9 Stafford Borough has a strong economy. Unemployment rates are lower than the national average; 1.6% in the Borough compared to 3.6% in the West Midlands and 2.8% nationally. Skill levels are high with 47.9% of residents having NVQ level 4 qualifications or above and average wages are significantly higher than County, regional and national levels. The majority of the Borough has low levels of deprivation, with the exception of some areas of Stafford town including Highfields and Western Downs, Manor and Penkside.
- 2.10 Stafford town is the Borough's major employment centre, having the largest shopping centre in the area and containing the largest concentration of commercial premises and multiple retailers. Furthermore, the town contains a large range of stand alone employers and a number of industrial estates/business parks.
- 2.11 The area is very attractive to inward investors due to its central location and transport links, availability of labour and well located employment sites. New strategic employment sites are being taken up at Stafford and Stone, including Redhill Business Park, the extension of Beacon Business Park and Meaford. This is helping to offset past trends of a declining manufacturing sector.

## Regeneration and Growth

- 2.12 A number of exciting new projects are underway in the Borough to regenerate parts of Stafford town. These will create jobs, revitalise the public realm and provide much needed homes and will be guided for the long term by an overarching masterplan framework for Stafford Town Centre that:
- Recognises recent developments including Staffordshire Place, Riverside and Kingsmead, and the role played by the transformation of Stafford's Victoria Park;
  - Aligns the outputs from current live projects which are developing or have developed proposals for specific areas of the town centre;
  - Completes more detailed studies on specific areas.
- 2.13 The Stafford Gateway scheme is a major redevelopment site to the West of Stafford town. It will provide a new business and commercial district, a new entrance to Stafford Station, and residential areas. The new urban neighbourhood will provide a mix of apartments and family housing, and the business and commercial districts will offer 750,000 sq ft of office space, along with a hotel and car park.
- 2.14 Proposals to revitalise the northern part of the town centre (an area in and around the northern section of Greengate Street) where many retail units remain vacant are in the early stages. Investment opportunities will be available; the intention being to diversify the mix of uses and breathe life back into this area of the town.
- 2.15 Eastgate is a large area in the town centre that is in public ownership. There is a vision to build homes, new retail space and enhance the cultural offer of the town as it is located near to the existing Stafford Gatehouse Theatre.

## New Garden Settlement

- 2.16 Stafford Borough is considering a variety of visionary and far reaching proposals for the development of a new garden settlement. An early stage in this work has been the assessment of the Strategic Development Site Options<sup>8</sup> for potential locations, which has been published alongside this document as part of the evidence base. This would have the potential to provide a huge economic boost to the Borough including unlocking surplus brownfield land whilst creating a modern and sustainable living and working environment taking development pressure off existing settlements. There is an area of Ministry of Defence land in the north of the Borough and other

<sup>8</sup> <https://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base>

possible locations which have the potential for thousands of new homes and employment opportunities. Any proposals would also include local shops, community facilities such as schools and medical services, and potentially new transport interchanges.

## **The Natural and Historic Environment**

- 2.17 The natural landscape is characterised by flat low lying land positioned between the natural corridors of the Rivers Trent, Penk and Sow. Outside of these corridors much of the area is intensively farmed agricultural land (including stock farming), interspersed with ancient and semi-natural woodland, and grasslands. Part of the rural landscape is nationally recognised through the designation of the Cannock Chase Area of Outstanding Natural Beauty (AONB) in the south east of the Borough. Stafford Borough is also important for its biodiversity and areas of nature conservation. The Borough contains 3 RAMSAR sites (wetlands of international importance) at Aqualate Mere, Chartley Moss and Cop Mere, 15 Sites of Special Scientific Interest (SSSIs) and 4 Special Areas of Conservation (SAC) sites (Cannock Chase, Motte Meadows, Chartley Moss and Pasturefields).
- 2.18 The Borough has a rich historic environment, for example the town centres of Stafford, Stone and many of the rural villages have historic cores which are designated as Conservation Areas. In addition Trentham Gardens, Sandon Park, Shugborough Park and the German Military Cemetery on Cannock Chase are designated as Historic Parks and Gardens. There are two areas of Green Belt in the Borough, around the North Staffordshire Conurbation and in the south-eastern area of the Borough, including the Cannock Chase Area of Outstanding Natural Beauty.

## **Connectivity**

- 2.19 Due to its central location in the Country the Borough has excellent road and rail links. Stafford is situated on the M6, with junction 14 to the north and junction 13 to the south. It also has excellent connections to the M54, M42 and M6 toll. The town's accessibility on the West Coast Main Line means that London Euston is only 1 hour and 20 minutes journey time, Manchester 55 minutes and Birmingham 30 minutes. It is proposed that HS2 may deliver an integrated station in Stafford reducing journey times to London Euston to under an hour, whilst generating additional capacity on other routes.
- 2.20 Locally work being undertaken on a western bypass for Stafford and there is a network of bus services between settlements and within the built up areas.

## Towns and Rural Areas

- 2.21 Stafford town is at the heart of the Borough. With a population of approximately 66,000 it is the County town and has an expansive retail and leisure offer including the Gatehouse Theatre, new Odeon Luxe Cinema and recently established Riverside retail and leisure development. Victoria Park is a popular leisure destination and it is currently undergoing a £2.5 million restoration including a new café and outdoor entertainment areas. Stafford hosts the headquarters of the Borough and County Councils, and exhibits a historic market square and town centre. Recently there has been significant new housing growth on the outskirts of the town with new educational, open space and community facilities to follow. Key employment and business parks support the local economy; there is also a hospital, an MOD site and The New Beacon Group education campus (previously Staffordshire University).
- 2.22 Stone is an attractive market town to the north of the Borough which has expanded in size in recent years (around 16,500 residents). It hosts a large and very popular business park (including employers such as Jaguar Land Rover) and has a bustling town centre. Aston Marina is a popular tourist destination, especially with the canal boat community. A new state of the art leisure centre has recently been built and there are proposals for extensive play and recreational facilities at Westbridge Park.
- 2.23 There are a large number of market towns and villages across the Borough including Eccleshall, Gnosall, Barlaston, Little Haywood and Colwich, Great Haywood and Hixon. There are also smaller hamlets and many individual rural dwellings. The most northern parts of the Borough are different in character and are neighboured by the suburban fringes of Newcastle-under-Lyme and Stoke-on-Trent at Clayton, Blythe Bridge, Trentham and Meir Heath.

### 3. Vision and Strategic Objectives



Cannock Chase view

## Section 3 Vision and Strategic Objectives

3.1 The Stafford Borough Council Corporate Business Plan 2018-21<sup>9</sup> defines the Vision for the Borough as:

“A prosperous and attractive borough with strong communities.”

To support this Vision, for the three years of the Corporate Business Plan, three corporate business objectives are proposed:

- To deliver sustainable economic and housing growth to provide income and jobs.
- 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.
- To be a well-run, financially sustainable and ambitious organisation, responsive to the needs of our customers and communities and focussed on delivering our objectives.

3.2 This Vision, along with its associated Objectives, has strong links to the concept and delivery of Sustainable Development. Further it is important that the Vision and Objectives expressed by the New Local Plan are complementary to the wider Vision of Stafford Borough Council. There are, however, two important riders to this necessary relationship:

- the timeframe for the New Local Plan (2020-2040) is somewhat greater than for the Corporate Plan (2018-21). Therefore the Local Plan Vision needs to “look further into the future”, particularly in respect of the challenges posed by, for example, Climate Change; and
- unlike the Corporate Plan, the New Local Plan will be required to undergo the strictest of scrutiny via the Plan Examination process before it can be adopted by the Council. This is to ensure that the Plan is supported by evidence, accords with National Policy, and meets the tests of legal compliance and soundness.

3.3 The Vision of the currently adopted Local Plan (2011-31) Vision is expressed as follows:

By 2031 Stafford Borough will have:

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<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Policy%20and%20Plans/Corporate%20Business%20Plan%202018-2021.pdf>

- 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;
- b. provided high quality designed developments including recreation, open space and sport provision;
- 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;
- d. reduced the need to travel, through the provision of increased services and facilities in key locations to sustain the surrounding rural areas;
- e. addressed issues of climate change, including a reduction of carbon emissions and flood risk with sensitively delivered renewable energy schemes;
- f. improved accessibility to services and facilities by providing safe, attractive and convenient sustainable connections from and to new developments;
- g. been protected, conserved and enhanced to provide an exceptionally high quality of environmental, historic and landscape character;
- h. community supported Neighbourhood Plans in place
- i. delivered new development, where possible through the re-use of brownfield land and land not of high environmental value, in sustainable locations at Stafford, Stone and the Borough's selected villages;

By 2031 the County Town of Stafford will have:

- j. provided an enhanced national and regional profile through major new housing and employment developments as the Growth Point, supported by a range of new infrastructure provision;
- k. achieved a strengthened and diverse economy with high quality jobs, based on specialist industries, including Small & Medium-sized Enterprises (SMEs) and the Ministry of Defence;
- l. increased educational attainment at all levels and retained high quality graduate skills delivered by further education facilities and bolstered by significant inward investment;
- m. significant levels of high quality housing including affordable and specialist housing as well as extra care provision in recognition of an ageing population;
- n. major town centre investments and exceptional levels of accessible community services and facilities;
- o. provided new green infrastructure / biodiversity enhancement schemes;

By 2031 the market town of Stone will have:

- p. conserved and enhanced the local character of the town and its canal side vistas;
- q. a vibrant local economy and community activities;
- r. an increased mix of high quality residential developments supporting first class business development;
- s. provided new green infrastructure / biodiversity enhancement schemes;
- t. delivered a range of new housing at selected villages to provide for objectively assessed needs;

- u. avoided development in flood risk areas;
- v. increased the availability of accessible and enhanced high quality services and facilities, including public transport provision;
- w. provided new green infrastructure / biodiversity enhancement schemes;
- x. supported a diverse and regenerated rural economy;

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.

Area of Conservation (SAC), and the Green Belt areas within Stafford Borough will have benefited from a sustainable approach to strategic housing development. This approach will have been tailored to delivering accessible natural green-space for residents and workers, and will have maintained and enhanced the character of these important local resources' as well as their unique environmental qualities and openness.

This Vision is then supported by a total of twenty eight objectives

- 3.4 It is an appropriate time, with the publication of this “Issues and Options” document, to consider whether the Vision and strategic objectives remain relevant to planning for growth in Stafford Borough up to 2040.
- 3.5 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.

- 3.6 The Scoping the Issues consultation (July-September 2018) of the Stafford Borough New Local Plan 2020-2040 considered the Vision of the Plan and established a number of key and recurring themes. These are shown by Figure 3.1 below:

Figure 3.1

Scoping the Issues Consultation – Vision and Objectives

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

3.7 The Council is minded to develop a Vision for the Plan that is more succinct and which conveys a strong sense of its development priorities for the next plan period. This would need to recognise the key themes that emerged from the “ Scoping the Issues” consultation, and the Visions expressed for the Corporate and Growth Strategies. Importantly the Vision (along with the underpinning Objectives and constituent policies) will need to recognise the necessary contribution by planning and the consequent commitment in Stafford Borough to the Government’s stated Policy for Carbon Neutrality by 2050.

**Question 3.B**

Do you agree that the Vision should be shorter?

3.8 In order to achieve this, the Vision should express and give support to a holistic strategy to enable the raft of inter-relating policies to address the significant climate change and social challenges whilst responding to the imperative for sustainable growth, a high quality environment, excellent design and the facilitation of innovative solutions.

**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?

3.9 Sitting under the current vision are some twenty eight spatially-focused objectives. These are reproduced below:

Key Objectives - Stafford

1. Provide new high quality homes between 2011 - 2031 across of range of sites including accommodation for an ageing population and military personnel
2. Create new communities supported by district centres, open space, sport & recreation provision, new health centres including GP surgeries and new primary schools
3. Deliver mitigation measures against any significant adverse impacts on the Cannock Chase Special Area of Conservation
4. Avoid development in flood risk areas
5. Provide new high quality employment land between 2011 - 2031 across a range of sites that mitigates against adverse impacts, made available for new research and development facilities as well as growth opportunities to provide new businesses for graduate employment and inward investment to diversify the economy
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
7. New open space, sport and recreational facilities, including indoor and outdoor provision, to meet the needs of an increasing population
8. Deliver major new mixed use town centre retail schemes to make Stafford a significant sub regional centre for retailing, leisure and cultural attractions
9. Provide new development at Stafford to encourage greater retention of high quality Further & Higher Education professionals in the area and up-skill educational attainments
10. Support the role of public sector organisations who have their headquarters or a significant presence in Stafford including Staffordshire University, Stafford College, Staffordshire Police, the Ministry of Defence, the Prison Service and Health Service co-ordination
11. Deliver the Western Access Improvements to improve the transport network to the west of Stafford town centre, deliver the Northern Access Improvements and implement the Eastern Access Improvements
12. Deliver the conservation and enhancement of Stafford's heritage assets, including the character and appearance of its conservation areas

Key Objectives - Stone

13. Provide new high quality homes in mix and tenure across a range of sites that mitigate against any adverse impacts and support the sustainable community
14. Deliver a new health centre for Stone as part of future community facilities
15. Provide new high quality employment land across a range of sites which mitigates against adverse impacts, made available for new research and development facilities, as well as growth opportunities to provide for expansion to new and existing businesses to diversify the economy
16. Provide infrastructure, including an upgraded electricity distribution network, new sewage facilities, green infrastructure links, enhanced public transport and new education provision through housing developments
17. Deliver new town centre developments to enhance Stone for retail, leisure, canal and river based activities, and community facilities
18. New open space sport and recreational facilities including indoor and outdoor provision to meet the needs of the community
19. Safeguard and enhance the landscape setting through new green infrastructure provision, avoiding development in flood risk areas and habitat creation including the role of the Trent Valley corridor through the town in terms of biodiversity, accessibility, recreation and community uses
20. Conserve and enhance the historic character and heritage assets of Stone and secure the sustainable use and management of its historic buildings

Key Objectives - Areas outside of Stafford & Stone

21. Provide for high quality new small scale housing development at appropriate villages that reflects their distinctive local character
22. Deliver sensitive additional facilities to provide an improved level of local services appropriate to settlements, that reduces the need to travel and is in keeping with the local character, the historic environment and the rural setting
23. Provide increased rural employment through agricultural and livestock businesses, renewable energy schemes, low impact hi-tech industries in agricultural buildings and sensitive new tourist attractions that enhance the high quality environment of the area
24. Deliver new employment land through the expansion of existing industrial areas
25. Provide new high quality homes, including new affordable homes, on appropriate sites in existing villages, to support sustainable rural communities in the future
26. Support increased habitat maintenance, restoration and creation, and the encouragement of a diverse range of species as part of the strategic

- green infrastructure network across the Stafford Borough area, whilst also protecting designated sites, including the Special Areas of Conservation
27. New open space, sport and recreational facilities to meet the needs of the community, including through increased multi-use provision such as community halls
  28. Encourage the sustainable management of heritage assets, especially those identified as at risk, and deliver development which respects local character and distinctiveness

**Question 3.D**

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

**Question 3.E**

Is the overall number of objectives about right?

**Question 3.F**

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

CONSULTATION

## 4. Sustainability and Climate Change



St Mary's Gate, Stafford

## Section 4 Sustainability and Climate Change

- 4.1 The UK Parliament have recently declared a “Climate Emergency<sup>1</sup>”, emphasising the importance of working towards a greener and more sustainable future on a national scale. This follows the introduction of multiple legislative changes in previous years, which set out a series of objectives that, when met, will help the UK to achieve carbon neutrality. For example, the Climate Change Act of 2008 was amended in 2019 to state the objective of reducing carbon emissions in the UK by 100% by 2050<sup>10</sup>.
- 4.2 Plan-making provides an opportunity to positively influence the future of a place through the provision of practical solutions and the facilitation of behaviour change to negate the implications of climate change. To achieve this it is important to recognise that a planning horizon of 50-100 years is required.
- 4.3 The National Planning Policy Framework<sup>3</sup> highlights the importance of the planning system in delivering sustainable development alongside supporting the transition to a low carbon future. It also states that Local Plans should take a proactive approach to mitigating and adapting to climate change.
- 4.4 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. When this is achieved, economic opportunities are created, whilst the residents, natural environment and the built environment of Stafford Borough will benefit in equal measure.
- 4.5 Local Plans provide many opportunities to help communities mitigate and adapt to the negative effects of climate change. This is highlighted in the “Rising to the Climate Crisis, A guide For Local Authorities on Planning for Climate Change” document<sup>4</sup>, produced in collaboration between the Town and Country Planning Association and the Royal Town Planning Institute. This seeks to empower Local Planning Authorities to make the transition to a low-carbon future through:
- Cutting greenhouse gas emissions. 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.

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<sup>10</sup> <https://www.legislation.gov.uk/ukxi/2019/1056/contents/made>

- Enabling behaviour change. Increasing sustainability can also be achieved through making suitable provision for individuals to adapt their behaviour to lead more sustainable lives. Locating development in such a way that it reduces the need to travel by car to access services and facilities reduces carbon emissions. This can be achieved through increasing access to public transport, encouraging residents to make journeys on foot or by cycling as well as using innovative technologies such as electric vehicles and other forms of non polluting travel.
  - Increasing resilience. Ensuring the built and natural environments are able to withstand extreme weather events that will occur as a result of a warming climate is imperative when considering the safety of communities. Resilience can be increased through the employment of adaptive measures which reduce water consumption, reduce flash flooding and prevent the overheating of buildings.
- 4.6 The document also emphasises how action taken to mitigate and adapt to climate change can have multiple benefits aside from increasing sustainability in the area. Encouraging residents to walk and cycle increases health and wellbeing, whilst increasing energy efficiency in buildings can lead to the reduction of energy bills. Community initiatives working towards a sustainable agenda such as food growing programmes and community energy groups can increase community spirit, enhancing the lives of those who participate.
- 4.7 Efforts to mitigate and adapt to Climate Change within the Borough are currently detailed in Policy N2 and Policy N3 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.
- 4.8 It is also important to recognise that, in respect of Climate Change, there is only a limited amount that the New Local Plan can influence in isolation. Therefore, having declared a climate emergency<sup>11</sup>, the Borough Council will be publishing a new Climate Change Strategy alongside the New Local Plan “Issues and Options” material and is undertaking (in partnership with a number of neighbouring authorities) a new Climate Change Adaptation and Mitigation study which will be published in due course. When combined these will enable the Council to adopt a stronger corporate view in these matters.

### **Climate Change Mitigation**

- 4.9 Considering how the mitigation of climate change can be enabled through a Local Plan is identified as being an important objective in the NPPF<sup>5</sup>.

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<sup>11</sup> <https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Committee%20Minutes%2019-20/Council/MCouncil%20-%202023%20July%202019.pdf>

- 4.10 Climate change can be mitigated in a variety of ways. Increasing energy efficiency within the built environment decreases the energy demand of an area, whilst reducing energy bills. Transitioning energy networks from fossil fuel to renewable energy sources reduces carbon emissions and eliminates the need for fuel exploration and extraction. Therefore, the necessity for activities such as fracking and coal mining is eliminated. Urban tree planting prevents the formation of heat island effects in urban areas, whilst simultaneously removing CO<sub>2</sub> from the surrounding environment.
- 4.11 By responding positively to Climate Change, the new Local Plan will contribute to achieving carbon neutrality by 2050.

### Energy Efficiency

- 4.12 Reducing energy consumption is an intrinsic requirement when considering tackling climate change. This can be achieved in the built environment by increasing the energy efficiency of buildings.
- 4.13 The energy efficiency of a building should be considered when establishing its layout and design. This is emphasised in the NPPF, which states that new development should be planned for in ways that reduce greenhouse gas emissions through factors such as its design, orientation and location.
- 4.14 Building Regulations (Part L)<sup>6</sup> sets out a framework that ensures energy efficiency has been considered in the design process. However, alternative frameworks are available which require standards in excess of those described in the Building Regulations to be met. Further is the current Government consultation on the Future Homes Standard<sup>12</sup>.

#### Question 4.A

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

- a) Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved?
- b) What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?

<sup>12</sup> <https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings>

## Renewable Energy

- 4.15 The transition to a renewable energy network is crucial in securing a low carbon future. The NPPF states that Local Plans should provide a positive strategy for the use of energy from renewable sources. This includes identifying sites suitable for renewable and low carbon energy infrastructure, and enabling developments to draw energy from on site renewable sources.
- 4.16 Guaranteeing the new Local Plan makes suitable provision for the transition to a low carbon and renewable energy network is therefore of great importance.

### Question 4.B

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

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

- 4.17 The NPPF states that wind energy developments will only be permitted where they are developed on land allocated for that purpose in a Local Planning Authorities' Local Plan. The council does not currently have any land allocations intended for wind energy developments.

### Question 4.D

Should the council allocate sites for wind energy developments in the Local Plan?

If so, where should they be located?

## Adapting to Climate Change

- 4.18 The revised NPPF states that Local Plan policies should ensure the future resilience of the built environment to the effects of climate change.
- 4.19 The supply of resilient buildings requires a proactive approach. There are many adaptation measures which can be integrated into developments to achieve this. For example, houses can be designed to ensure conservative water consumption, whilst multi-functional sustainable urban drainage systems can be integrated into developments to reduce surface water flooding. Safeguarding homes, infrastructure and communities from the future negative effects of climate change can only be achieved when adaptive measures are embedded in development.

- 4.20 Further information on the Climate Change implications for the Water Environment can be seen in the recently published Strategic Flood Risk Assessment<sup>13</sup>.

### **Water Efficiency**

- 4.20 Building Regulations (Part G)<sup>7</sup> require the estimated water consumption of a new dwelling to be no more than 110 litres a day. However, there is scope to require developments to build units where water consumption levels will be lower than this.

#### **Question 4.E**

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

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<sup>13</sup> <https://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base>

## 5. The Development Strategy



Redhill Business Park, Stafford

## Section 5 The Development Strategy

- 5.1 A key role of the new Local Plan 2020-2040 for Stafford Borough will be to set out the scale and distribution of new housing and employment development. This chapter defines the Spatial Principles and subsequent Development Strategy for the new Local Plan and considers:
- The overall presumption in favour of sustainable development
  - Growth options for Delivering new housing & employment across the Borough
  - A new settlement hierarchy and Green Belt settlements
  - Spatial Scenarios & Growth Options for the distribution of new development across the Borough
  - Potential Garden Communities / Major Urban Extensions in Stafford Borough
  - Growth options for Delivering new employment land
  - A methodology and approach to identify site options and boundaries
- 5.2 The new Plan will need to provide at least a 15-year timescale from the date of adoption. Therefore the Plan period will cover the years from 2020-2040.

### The Presumption in Favour of Sustainable Development

- 5.3 Paragraph 11 of the NPPF (2019)<sup>14</sup> states that plans and decisions should apply a presumption in favour of sustainable development. As such, it is important that this fundamental principle is recognised as the foundation of the Plan for Stafford Borough 2020-2040. The Spatial Principles (SP) policies of the Plan for Stafford Borough 2011-2031 (adopted June 2014)<sup>15</sup> establish the current development strategy for the Borough. Policy SP1 (reproduced below) sets out these and re-affirms the Borough's commitment to the principle of a presumption in favour of sustainable development although the Planning Inspectorate no longer require such a policy to be included.

#### SPATIAL PRINCIPLE 1 (SP1) - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants and communities jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the

<sup>14</sup>

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

<sup>15</sup>

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Planning%20Policy/Plan%20for%20Stafford%20Borough/PFSB-Adoption.pdf>

economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise, taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

#### Question 5.A

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

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

- 5.4 The 2019 NPPF (paragraphs 59-67) 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 justifies an alternative approach. It also requires local authorities to take into account any needs that cannot be met within neighbouring areas.
- 5.5 It is therefore necessary, as the NPPF indicates, to establish the appropriate scale of development for the next Plan period, 2020-2040.
- 5.6 A key piece of evidence in this determination has been the “*Stafford Borough Council Economic and Housing Development Needs Assessment*”<sup>16</sup> published in 2019 (EHDNA). This study was independently conducted on behalf of the Council by the nationally recognised consultancy Nathaniel Lichfield and Partners utilising the methodology requirements described by the NPPF and the accompanying Planning Practice Guidance. The report looks at the anticipated requirements for both economic development and housing. The technical details of the data below are fully described within the report.

<sup>16</sup> <https://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base>

- 5.7 An important conclusion of the EHDNA is that Stafford Borough comprises its own Housing Market Area (HMA) and that its Functioning Economic Market Area (FEMA) predominantly aligns with Stafford Borough's administrative boundary. Through the Duty to Co-operate the Council will continue discussions to determine the interdependence upon housing requirements with adjoining HMAs/FEMAs and how these could be addressed.
- 5.8 The EHDNA describes six possible future housing need scenarios which will inform the determination of the Housing Requirement for the revised Plan. These are based on the following assumptions and approaches:

**Scenario A Standard Method** – based on the Government Local Housing Need methodology 2019-2029 as defined by 2019 PPG.

A Housing Requirement of ***408 dwellings per annum*** (dpa) is calculated when using Standard Government Local Housing Need methodology 2019-2029 for Stafford Borough;

**Scenario B Baseline 2014** – utilises the 2014-based Sub National Population Projections (SNPP) and headship rates from the Government's CLG 2014-based Sub National Household Projections (SNHP);

**Scenario C Mid Year Estimates (MYEs) 2017** – applies the same assumptions as Scenario A but utilises the 2017 MYE to adjust the starting position to the latest population position;

**Scenario D Cambridge Econometrics (CE) Baseline** – this considers the implications of achieving the net job growth set out in the CE baseline forecasts (c. 5,920 jobs over the period 2020-2040);

**Scenario E Jobs Growth – Policy on.** Considers a regeneration scenario which includes the growth projected to occur at a potential New Garden Community / Settlement and Stafford Station Gateway, around 12,500 new jobs;

**Scenario F Past trends Jobs Growth.** Projecting forward the Compound Average Growth Rate (CAGR) job growth of 0.83% achieved between 2000 and 2018 in Stafford Borough over the 2020-2040 plan period;

**Scenario G Jobs Growth – Jobs Boost.** Based on the CE baseline forecast with net growth increased by 50% accommodated above existing CE baseline (resulting in a total job growth of c. 8,900).

Scenarios B-G have also been run using accelerate headship rates (***Partial Catch Up rates – PCU***). Starting post-2017, headship rates amongst 15-34 year olds are projected to make up 50% of the difference of long term trends. These age groups were most significantly impacted during the recession as a result of tougher deposit requirements and falling relative incomes. As the Sub National Household Projections (SNHP) draws on past trends, this results in household formation rates continuing to be suppressed going forward, locking in patterns of low household formation rates for particular age cohorts. Applying PCU rates to the modelling rebalances the household formation rates to reflect the accelerated rates young people who are able to form households since the end of the recession.

The outputs of these economic scenarios are summarised by Table 5.1.

Table 5.1 Summary of outputs for Future Housing Needs Scenarios B to G.

Component	Scenario											
	B		C		D		E		F		G	
Job Growth	1,230		1,369		5,929		12,473		13,126		8,900	
Labour Force Growth	1,179		1,312		5,683		11,955		12,581		8,530	
Population Change	8,243		8,508		16,402		27,201		28,653		21,515	
Of which natural change	-3,952		-3,686		-2,251		-1,467		-646		-1,464	
Of which net migration	12,196		12,194		18,653		28,677		29,299		22,979	
		PC U		PC U		PC U		PCU		PCU		PCU
Households	5,611	6,510	5,210	6,135	8,467	9,518	12,605	13,845	13,313	14,527	10,517	11,629
Dwellings	5,761	6,684	5,349	6,299	8,693	9,773	12,942	14,215	13,668	14,915	10,798	11,939
Dwellings per annum	288	334	267	315	435	489	647	711	683	746	540	597
21% uplift in alignment with Standard Methodology	349	404	324	381								

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. Therefore Scenarios B and C have not been considered any further as part of preparing the development strategy for the New Local Plan, as these provide figures of less than 408 dpa. Through the other methodologies derived from the growth scenarios D, E, F and G suggest housing requirements ranging between 435 and 683 dpa or, when the PCU is applied, 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?  
What is your reasoning for this answer?
- b) Should a Partial Catch Up rate allowance be incorporated?  
What is your reasoning for this answer?

- 5.10 The future housing need scenarios set out above reflect population & household growth projections (including an affordability ratio) together with a number of economic drivers and market signals. Within the EHDNA report the level of affordable housing need for Stafford Borough is identified as ranging between 252 and 389 new affordable dwellings per year, depending on the percentage of income used (252 - 25%; 389 - 33% of income). The Planning Practice Guidance is clear that the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing development. When current overall housing delivery rates in Stafford Borough are considered alongside 30% of this new housing being affordable it is unlikely that the full affordable locally assessed need (252-389) could be achieved. Nevertheless, via an uplift in the total housing numbers for the Borough, it would be possible to assist in the delivery of the required affordable housing. As such this approach is considered alongside the other factors in the ultimate determination of the overall housing provision.
- 5.11 The adopted Plan for Stafford Borough 2011-2031 currently contributes approximately 3,000 planning commitments (essentially planning permissions and under construction) and 3,000 homes uncommitted on Strategic Development Locations totalling 6,000 homes which will be delivered in the overlap period of the two Plans (2020-2031). There is therefore the option of "discounting" these dwellings from the new Plan period of 2020 to the end date of the old Plan (2031), thereby reducing the overall number of required "new" commitments in the first eleven years (approx.) of the New Plan Period 2020-2040, due to this overlap.
- 5.12 Therefore it is important to consider whether existing planning commitments and uncommitted allocations in the adopted Plan should be discounted or not. Taking account of existing housing provision by way of a discounted approach would avoid the perception that double-counting of future housing requirement is taking place between 2020 and 2031. There are, however, two key considerations attached to such a discount which will need to be borne in mind in determining the housing requirement eventually set:
- a) In applying such a discount the Authority has to be absolutely confident that all of these dwellings will be delivered (i.e. built out) within the

timeframe of the current Plan (i.e. by end of March 2031) otherwise a shortfall of delivery will occur; and

- b) The Authority and its Partners will need to satisfy themselves that such a discount will not impede the growth agenda represented by the Economic Growth Strategy of the Borough.

5.13 The impact of this discount is demonstrated by Table 5.2 below which takes account of each Growth Scenario and the two Plan Periods (2011-31 and 2020-2040) under consideration.

Table 5.2 Implications of the application of a discount between 2020 and 2031 to take account of existing commitments etc. in the cross-over period of the adopted and new Plans

	Economic Scenario									
	A		D		E		F		G	
		PCU		PCU		PCU		PCU		PCU
THR <sup>1</sup> 2020-40 (EDHNA)	8,160	n/a	8,693	9,773	12,942	14,215	13,668	14,915	10,798	11,939
THR 2020-31 11 years (55%THR)	4,488	n/a	4,781	5,375	7,118	7,818	7,517	8,203	5,939	6,566
AHR <sup>2</sup> 2020-2031 no discount applied	408	n/a	435	489	647	711	683	746	540	597
THR 2020-31 6,000 dw discount applied <sup>3</sup>	-1,512	n/a	-1,219	-625	1,118	1,818	1,517	2,203	-61	566
AHR 2020-2031 <b>discount applied</b> <sup>4</sup>	Zero	n/a	Zero	Zero	124	202	169	200	Zero	51
THR 2032-2040 <sup>5</sup> 9 years (45% THR)	3,672	n/a	3,912	4,398	5,824	6,397	6,151	6,712	4,859	5,373
AHR 2032-2040	408	n/a	435	489	647	711	683	746	540	597
THR 2020-40 discount applied	3,672	n/a	3,912	4,398	6,942	8,215	7,668	8,915	4,859	5,939

Notes to table 5.2

1 THR – Total Housing Requirement

2 AHR – Annual Housing Requirement

3 Derived by subtracting 6,000 from the THR 2020-31 shown on the second row to take account of the commitments etc in the existing plan which extends to 2031. Where the THR 2020-31 with 6,000 discount applied figure is shown as a negative number (Row 4) this implies an over-provision within the 2011-2031 (ie current) Plan Period. This excess (or over-provision) cannot be carried forward to offset the latter part (2032-40) of the new plan.

4 Where the discount (6,000) is greater than the THR in the period 2020-31 the AHR is shown as “zero”.

#### Question 5.C

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

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

Please explain your reasoning.

### The Sustainable Settlement Hierarchy

- 5.14 The currently adopted settlement hierarchy directs development at Stafford (7,000 homes), Stone (1,000 homes); the Key Service Villages (1,200 homes); and the Rest of the Borough (800 homes).
- 5.15 Whilst the Strategic Development Locations (SDLs) at Stafford and Stone are now delivering the required level of development they have been slow to take off. This has been largely due to the levels of infrastructure required (notably in respect of Stafford West and Stafford North). This slow take off of strategic sites is similar to such developments elsewhere and needs to be factored into the make up of future allocated sites to ensure that the land supply can be properly managed.
- 5.16 Meanwhile development in the Key Service Villages and the Rest of Borough has ensured that the Council has a five year land supply. However, it is recognised that some of the Key Service Villages have received a disproportionate amount of housing than others (Table 5.3).

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

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

5.17 This apparent imbalance is further illustrated by the following examples from the 'Rest of the Borough' area outside of the current Settlement Hierarchy:

- Church Eaton and Fulford have primary schools and a public house yet no houses have been granted during the plan period, as these settlements are outside of the adopted settlement hierarchy;
- In Seighford planning permission has been granted for 18 houses (approx. 18% growth in the plan period) in the village despite it not being a recognised Key Service Village, and having a primary school and public house. This is more development than a number of the Key Service Villages;
- 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.

5.18 During the summer of 2018 the emerging Settlement Assessment was consulted upon as part of the development of the evidence base for the New Local Plan. This raised a number of themes and considerations:

### Settlement hierarchy

- The proposed settlement hierarchy and categorisations (paragraphs 5.4 and 6.1 of the 2018 consultation document<sup>17</sup>) were broadly welcomed.
- There was general support for the provision for proportionate growth within all settlements, including those in rural areas to enable natural growth and improved sustainability of those settlements.
- Some argument was made against any development in smaller settlements without the provision of appropriate infrastructure and services (e.g. transport, health, education, employment) on sustainability grounds.
- The “pepper-potting” of development across small sites in rural areas was argued to limit opportunities for appropriate infrastructure/services provision and limit the provision of affordable housing
- Stafford should continue in its principal settlement role.

### Settlement boundaries

- The suggestion was made that, by permitting development solely in settlement boundaries, buildings that were previously used for retail/other services or employment uses can be lost to housing. This was stated to ultimately have the potential to cause a decline in the sustainability of settlements.
- Some concern was expressed that expanding Stone settlement boundary would result in ill-defined town/countryside edges

### Methodology

- It was suggested that the methodology should allow flexibility in its assessment and categorisation of settlements in order to recognise the role of settlements that fall short of the threshold numbers, but contain services and facilities akin to larger settlements.
- Suggestion that all smaller settlements should be included in the settlement assessment

5.19 Consequent to the 2018 consultation it was considered important to revisit and update the settlement assessment and re-examine the resulting settlement hierarchy so that development appropriate to the needs of the Borough can be delivered through:

- recognising both the size of, and available facilities in each settlement;
- permitting limited growth in rural areas so that these communities can grow organically, can respond to their changing demography and do not stagnate;
- enabling a more consistent and proportionate distribution of growth.

<sup>17</sup> <https://www.staffordbc.gov.uk/new-local-plan-settlement-assessment-and-settlement-profiles-consultation>

## The 2019 New Settlement Hierarchy

5.20 It is important for the new Local Plan to direct the growth in both employment and housing supply to the locations best suited and most attractive to the market, whilst ensuring there are no locations that are over-burdened or that other locations are not starved of growth. Paragraph 65 of the National Planning Policy Framework (NPPF) states that a housing requirement figure should be established for the whole strategic policy making area, with strategic policies setting out housing provision for designated neighbourhood areas. In Stafford Borough neighbourhood plan areas are designated as individual Parish Council areas, except in Stafford town where neighbourhood forums would need to be established. The New Local Plan needs to reflect the overall strategy for the pattern and scale of development. Once adopted these housing figures for neighbourhood plan areas would not need to be re-tested at subsequent neighbourhood plan examinations unless there has been a significant change in circumstances. In addition the NPPG states:

‘Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However all settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence’. Ref ID 50-001-20140306) (NB – the underlining within this quote’s the Council’s emphasis).

5.21 As a starting point for considering the housing requirements for each Parish area across Stafford Borough, including the towns of Stafford and Stone, the EHDNA has reflected paragraph 66 of the NPPF to provide an indicative figure for each neighbourhood area based on the population of the neighbourhood area, the availability of land, house prices & affordability, together with available services. The table in Appendix 1 of this consultation document provides the relevant “share” of housing need based upon the base economic scenario (Scenario A – 408 dw/annum) and the distribution of dwellings across the Borough at the time of the 2011 Population Census.

5.22 Further, the updated NPPF requires 10% of sites in a Local Plan to be 1 hectare or less. It also includes a new section on rural housing and the need to ‘identify opportunities to bring for villages to grow and thrive, especially where this will support local services’<sup>18</sup>. This important change makes the proportionate growth of smaller settlements to be in-line with National Policy and will be explored through this Plan via the identification of small sites in the

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<sup>18</sup> NPPF para 78

smaller settlements across Stafford Borough. The final element of this chapter entitled 'Site Options' identifies the methodology for potential locations of new development across the Borough's settlement hierarchy, based on the local context for the area detailed below.

- 5.23 Less than a quarter of the Borough's area is identified as Green Belt, and the NPPF reinforces the Government's commitment to maintain its protection and states that these should only be altered where 'exceptional circumstances are fully evidenced and justified'<sup>19</sup>. Before changes are made to Green Belt boundaries, the Council is required to 'demonstrate that it has examined all other reasonable options for meeting its identified need for development'<sup>20</sup>.
- 5.24 Therefore, on the assumption that the Borough's development need for the Plan period can be accommodated on land not designated as Green Belt, the new Local Plan will not look at revising the Green Belt boundary, although NPPF<sup>21</sup> does permit limited infilling in villages, limited affordable housing and limited infilling or the partial or complete redevelopment of previously developed land within the Green Belt.
- 5.25 The 2019 review revisits the work completed in 2018 (see the Settlement Assessment and Profiles<sup>22</sup>) and includes existing commitments (to take into account currently permitted expansion) alongside settlement size and facilities/services. Each attribute is scored and the proposed Settlement Hierarchy derived from these scores (for details see the Settlement Assessment). The outcome of the 2019 Settlement Hierarchy review is summarised at Table 5.4.

Table 5.4 Proposed Settlement Hierarchy 2019

Tier	Settlement Category	Description
1	Stafford	Largest urban area in the Borough with a regionally significant service centre role providing employment, retail and other facilities, and a key role in driving growth. This also includes Baswich, Berkswich, Walton-on-the-Hill.
2	Stone	The second largest town in the Borough, providing employment, retail and other facilities for a wider area.

<sup>19</sup> NPPF para 136

<sup>20</sup> NPPF para 137

<sup>21</sup> NPPF para 145

<sup>22</sup> <https://www.staffordbc.gov.uk/new-local-plan-settlement-assessment-and-settlement-profiles-consultation>

Tier	Settlement Category	Description
3	North Staffordshire Urban Areas	These areas are located in the north of the Borough and include Clayton; Meir Heath / Rough Close; and Blythe Bridge.
4	Large Settlements	Eccleshall; Gnosall; Great Haywood; Hixon; Little Haywood and Colwich.
5	Medium Settlements	Brocton A34; Church Eaton; Derrington; Great Bridgeford; Haughton; Hilderstone; Hyde Lea; Weston; Woodseaves.
6	Small Settlements	Adbaston; Aston-by-Stone; Bradley; Cold Meece; Cotes Heath; Creswell; Croxton; Hopton; Milwich; Moreton; Norbury; Norton Bridge; Ranton; Sandon; Salt; Seighford.

#### 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?

- 5.26 It is anticipated that the Rest of the Borough (i.e. settlements and areas not identified in the Settlement Hierarchy) will contribute some housing to the overall housing requirement. This is likely to be small-scale development not requiring an allocation such as the re-use of rural buildings.
- 5.27 With the exception of the North Staffordshire Urban Areas (Tier 3) this Settlement Hierarchy deliberately excludes those settlements in the Green Belt in recognition of the special policy protection that this provides. Table 5.5 considers these settlements and their ability to accept redevelopment / development.

Table 5.5 Green Belt (GB) settlements

Green Belt status	Settlements	Redevelopment/Development implications
Surrounded by Green Belt beyond the built up area Situated within GB but development is permissible inside the settlement based on NPPF policy.	Barlaston Fulford Swynnerton Tittensor Yarnfield	New development within the settlement boundary meaning infill development, redevelopment etc. is permissible subject to other constraints (e.g. Conservation Area). Extension of the settlement boundary to permit more development would require a revision to the Green Belt boundary
Green Belt designation covers the built up area as well as surrounding land	Barlaston Park Meaford Oulton Stallington Trentham	The entire settlement is subject to the Green Belt restrictions. Only permissible development / redevelopment as detailed by NPPF. To remove “washed over” status or the introduction of a settlement boundary would require a review of the Green Belt
Bordered by Green Belt Where part of the settlement boundary is formed by GB	Brocton A34 Cotes Heath Hilderstone	The direction of possible expansion of the settlement is limited by the presence of Green Belt

#### Question 5.E

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

### Growth Options

- 5.28 The NPPF sets out how Local Plans should include strategic policies that set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development. NPPF<sup>23</sup> states: “Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development”.

<sup>23</sup> Para 23

- 5.29 The NPPF further provides some policy expectations and guidance that will have an influence on how the new Local Plan sets out a spatial strategy for the Borough. The NPPF<sup>24</sup> sets out the need for strategic policies that identify the pattern and scale of development, including the need for specific site allocations and a key diagram that illustrates the broad location of development. NPPF also sets out that local authorities should, "*... identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved*".<sup>25</sup>
- The remainder of this Section considers what the potential spatial options are, and the possible implications for Stafford Borough for the next plan period of 2020-2040

### Potential Spatial Scenarios

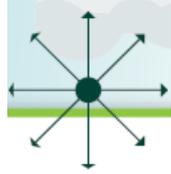
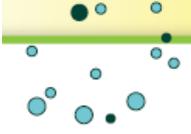
- 5.30 There are a number of potential spatial scenarios that could be utilised in the development of the spatial strategy to underpin the new Local Plan. This will ultimately lead to potentially difficult decisions around where housing and employment is to be located which, in turn is likely to be emotive. Specific local concerns will need to be considered alongside the strategic need for homes and employment opportunities.
- 5.31 The spatial form of development that emerges in the Plan is likely to follow a combination of the broad scenarios outlined in the Figure 5.1 below. These overarching scenarios are not necessarily mutually exclusive and, as with the current strategy, the preferred scenario is likely to involve a combination of these scenarios.

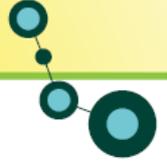
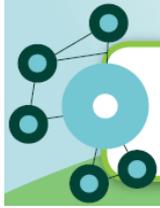
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<sup>24</sup> Paras 21 and 23

<sup>25</sup> Para 68

Figure 5.1 Potential spatial scenarios

 <p>Intensification of Town and District Centres</p>	<ul style="list-style-type: none"> <li>• Commonly encouraged in Local Plans in line with NPPF but unlikely to provide sufficient brownfield land to meet needs</li> <li>• Focus on housing and economy may conflict with other important functions of these centres</li> <li>• Townscape character may be affected</li> <li>• There are usually good existing transport links, although they may already be at capacity</li> </ul>
 <p>Garden Communities</p>	<ul style="list-style-type: none"> <li>• Depending on location, it may or may not be close to existing high quality transport corridors</li> <li>• Would need to be of sufficient scale to support provision of appropriate new infrastructure</li> <li>• May have a negative environmental impact but could be designed to deliver environmental gains</li> <li>• Designing a settlement from scratch provides opportunities for urban design principles to be followed throughout, such as Garden Towns principles</li> <li>• A New Settlement would take a long time to be delivered</li> </ul>
 <p>Dispersal of development</p> <p>This would involve spreading new development across the Borough including in smaller settlements</p>	<ul style="list-style-type: none"> <li>• Smaller sites unlikely to generate infrastructure needs alone so are unlikely to significantly contribute to improvements in infrastructure</li> <li>• The character of smaller settlements might be adversely affected by new development</li> <li>• Expanding some smaller settlements can support local shops, pubs, bus services etc</li> <li>• Smaller sites can improve deliverability rates</li> </ul>
 <p>Intensification around the edges of larger settlements and strategic extensions</p>	<ul style="list-style-type: none"> <li>• Can link into public transport networks</li> <li>• Focuses development close to, and supports, existing services and connections</li> </ul>

 <p>“String” settlement / settlement cluster</p> <p>Where development is focussed on a number of linked settlements. It could involve new and/or existing and/or expanded settlements</p>	<ul style="list-style-type: none"> <li>• Need to be close to existing high-quality transport corridors</li> <li>• Relies on there being suitable broad locations available for this type of development</li> <li>• May involve promoting development at some existing, small settlements which may significantly alter their character</li> <li>• A number of smaller settlements could collectively be of sufficient scale to be served by shared infrastructure</li> </ul>
 <p>“Wheel” settlement cluster</p> <p>Focus on Stafford and surrounding settlements</p>	<ul style="list-style-type: none"> <li>• Similar to the “string” cluster approach allowing strong links between the towns but with less reliance on the encouragement of a “development corridor”.</li> <li>• Would build on existing settlements and their relationships</li> <li>• A number of smaller settlements in the same locality could be grown to generate sufficient supporting infrastructure</li> <li>• Character of the settlements and surrounding area might be adversely affected</li> </ul>

5.32 The sustainability of these potential spatial scenarios is commented upon within the accompanying Sustainability Appraisal which will inform the spatial strategy. Similarly the responses to this “Issues and Options” consultation will be carefully considered in the selection of the approach ultimately selected.

#### Question 5.F

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

### Potential Garden Communities in Stafford Borough

5.33 The NPPF seeks to deliver sustainable development with a particular focus on significantly boosting the supply of new homes and bringing economic growth to local communities. Specifically it is recognised that planning for larger scale developments such as new settlements or significant extensions to existing towns may be the best way to achieve future supply, provided it is well designed, located and provided with the necessary infrastructure and facilities. Government has provided further guidance expressing the clear expectation that these new settlements should follow the Garden City principles of high

quality design, whilst delivering new infrastructure, services and facilities alongside innovative solutions of environmental and energy efficiency.

- 5.34 Within this context the Borough Council are currently exploring a number of potential locations to accommodate a new Garden Community (which also includes Major Urban Extensions) as reasonable alternatives, which have been identified by the Council and have been independently assessed (AECOM<sup>26</sup>). These are briefly described below:

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

- 5.35 The final choice of Garden Community(ies) / Major Urban Extensions will be determined by a number of factors including:

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

<sup>26</sup> <https://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base>



**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.

**Potential Growth Options**

- 5.36 There is a requirement to assess all reasonable options in terms of the appropriate development strategy for the New Local Plan 2020-2040. Therefore, it is considered that the following options need to be tabled during this stage of consultation:

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

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

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

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

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

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

Each option is discussed further below.

### **Growth Option 1: Stafford and Stone focussed development**

5.37 This option would seek to accommodate all the Borough's housing and economic needs within and immediately adjacent to the towns of Stafford or Stone only.

5.38 This option would require:

- i. significant urban extensions to Stafford and Stone, as well as a range of medium and small sites;
- ii. an intensification of development within these settlements; and
- iii. would also need to ensure that there is a five year land supply.

However, both towns have significant physical and environmental constraints and so it is considered that there would be insufficient land to fully deliver the Borough's needs.

5.39 It is considered that this option may be contrary to the NPPF, which seeks to support the opportunities for villages to grow and thrive.

### **Growth Option 2: Stafford, Stone & Key Service Village focussed development**

5.39 This is effectively 'business as usual' and seeks to roll forwards in the new Local Plan the existing Sustainable Settlement Hierarchy (Spatial Principle 3). With growth distributed as follows:

- Stafford 70%
- Stone 10%
- Key Service Villages 12%
- Rest of the Borough 8%

5.40 However as highlighted earlier (Sustainable Settlement Hierarchy paragraphs of this Section), the amount of new housing development in some of the Key Service Villages (KSV) has been disproportionate. At the same time some villages not identified as a KSV have a number of services and facilities yet are unable to grow.

5.41 This option could be considered contrary to the NPPF since:

- i. it does not allow the other settlements in the borough to have any new development;
- ii. It fails to acknowledge the north Staffordshire Urban Area.

### **Growth Option 3: Disperse development across the new settlement hierarchy**

- 5.42 This option would look at allocating development across all the settlements identified in the new Settlement Assessment. This would need to be based upon a settlement hierarchy with the greatest levels of growth directed at Stafford (Tier 1) through urban extensions and urban regeneration (for example Eastgate and / or Station Gateway); and Stone (Tier 2). A range of medium and small sites would also need to be allocated in these two towns.
- 5.43 As the Staffordshire Northern Urban Areas (Tier 3) are constrained by the Borough boundary and the North Staffordshire Green Belt, no new land would be allocated in this area for development. However, to permit some development settlement boundaries will be drawn around these urban areas to allow infill and the redevelopment of land contained within those settlement boundaries.
- 5.44 Some Large Settlements (Tier 4) experienced high levels of growth during the Plan for Stafford Borough 2011-2031. Therefore, to re-address this imbalance, growth may be limited in some of these settlements through smaller allocations. Should they wish to do so these settlement's local communities could deliver additional growth through a Neighbourhood Plan. Other settlements within this category could see allocations for large and medium sized development, taking into account their environmental and physical constraints, and assessment of sustainability.
- 5.45 In Medium (Tier 5) and Small Settlements (Tier 6) some growth would be expected. This would allow for some limited growth without overwhelming a village and its services, whilst not leading to an absence of growth that might threaten continued services and lead to an imbalance of population. This would be through a site allocation process with a settlement boundary drawn for each settlement.
- 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%  |

5.47 In considering the level of growth in Medium and Small Settlements this will take into account the sustainability credentials of that settlement. These sustainability criteria include:

- *Key facilities.* Where a settlement includes a primary school, convenience store, and some employment;
- Proximity to Stafford, Stone, Newport and the North Staffordshire Urban Areas of Clayton, Meir Heath / Rough Close and Blythe Bridge. Where a settlement is not overly constrained and is within 5km to these settlements.
- *Proximity to employment areas.* Where a settlement is within 5km of an employment area such as a Recognised Industrial Estate or Rural Employment Location.

5.48 Tables 5.6a and 5.6b consider the balance of development across the 2019 Settlement Hierarchy. These tables are, in format, identical, but highlight the impact of applying the discount to take account of the overlap of provision between the current and new Plan (see paras 5.11-5.13 and Table 5.2). In doing so tables 5.6a and 5.6b identify some very significant differences of the implied levels of new development for the different levels of the settlement hierarchy should such a discount be included.

Table 5.6a Implied distribution of housing across the 2019 Settlement Hierarchy should no discount be applied to take account of existing commitments etc.

Settlement Category	% of total development (range)	Economic Scenario	Without Discount Range (dw)											
			2020-2031				2032-2040				Total 2020-2040			
			Without PCU		With PCU		Without PCU		With PCU		Without PCU		With PCU	
lower end of range	upper end of range	lower end of range	upper end of range	lower end of range	upper end of range	lower end of range	upper end of range	lower end of range	upper end of range	lower end of range	upper end of range			
Stafford	50-70%	A	2244	3142	-	-	1836	2570	-	-	4080	5712	-	-
		D	2391	3347	2688	3763	1956	2738	2199	3078	4347	6085	4887	6841
		E	3559	4983	3909	5473	2912	4077	3198	4478	6471	9059	7108	9951
		F	3759	5262	4102	5742	3075	4305	3356	4698	6834	9568	7458	10441
		G	2969	4157	3283	4597	2430	3401	2686	3761	5399	7559	5970	8357
Stone	10-20%	A	449	898	-	-	367	734	-	-	816	1632	-	-
		D	478	956	1075	1075	391	782	440	880	869	1739	977	1955
		E	712	1424	1564	1564	582	1165	640	1279	1294	2588	1422	2843
		F	752	1503	1641	1641	615	1230	671	1342	1367	2734	1492	2983
		G	594	1188	1313	1313	486	972	537	1075	1080	2160	1194	2388
North Staffs Urban Area	5%	A	224	-	-	-	184	-	-	-	408	-	-	-
		D	239	-	269	-	196	-	220	-	435	-	489	-
		E	356	-	391	-	291	-	320	-	647	-	711	-
		F	376	-	410	-	308	-	336	-	683	-	746	-
		G	297	-	328	-	243	-	269	-	540	-	597	-
Large Settlements	10-20%	A	449	898	-	-	367	734	-	-	816	1632	-	-
		D	478	956	538	1075	391	782	440	220	869	1739	977	1955
		E	712	1424	782	1564	582	1165	640	320	1294	2588	1422	2843
		F	752	1503	820	1641	615	1230	671	336	1367	2734	1492	2983
		G	594	1188	657	1313	486	972	537	269	1080	2160	1194	2388
Medium Settlements	5-10%	A	224	449	-	-	184	367	-	-	408	816	-	-
		D	239	478	269	538	196	391	220	440	435	869	489	977
		E	356	712	391	782	291	582	320	640	647	1294	711	1422
		F	376	752	410	820	308	615	336	671	683	1367	746	1492
		G	297	594	328	657	243	486	269	537	540	1080	597	1194
Small Settlements	5-10%	A	224	449	-	-	184	367	-	-	408	816	-	-
		D	239	478	269	538	196	391	220	440	435	869	489	977
		E	356	712	391	782	291	582	320	640	647	1294	711	1422
		F	376	752	410	820	308	615	336	671	683	1367	746	1492
		G	297	594	328	657	243	486	269	537	540	1080	597	1194

Table 5.6b Implied distribution of housing across the 2019 Settlement Hierarchy where a discount is applied to take account of existing commitments etc.

Settlement Category	% of total development (range)	Economic Scenario	With Discount Range (dpa)											
			2020-2031				2032-2040				2020-2040			
			Without PCU		With PCU		Without PCU		With PCU		Without PCU		With PCU	
lower end of range	upper end of range	lower end of range	upper end of range	lower end of range	upper end of range	lower end of range	upper end of range	lower end of range	upper end of range	lower end of range	upper end of range			
Stafford	50-70%	A	1010	1414	-	-	826	1157	-	-	1836	2570	-	-
		D	1076	1506	1209	1693	880	1232	990	1385	1956	2738	2199	3079
		E	1909	2673	2259	3163	1562	2187	1848	2588	3471	4859	4108	5751
		F	2109	2952	2452	3432	1725	2415	2006	2808	3834	5368	4458	6241
		G	1336	1871	1633	2287	1093	1531	1336	1871	2430	3401	2970	4157
Stone	10-20%	A	202	404	-	-	165	330	-	-	367	734	-	-
		D	215	430	242	484	176	352	198	396	391	782	440	880
		E	382	764	452	904	312	625	370	739	694	1388	822	1643
		F	422	843	490	981	345	690	401	802	767	1534	892	1783
		G	267	534	327	653	219	437	267	535	486	972	594	1188
North Staffs Urban Area	5%	A	101	-	-	-	83	-	-	-	184	-	-	-
		D	108	-	121	-	88	-	99	-	196	-	220	-
		E	191	-	226	-	156	-	185	-	347	-	411	-
		F	211	-	245	-	173	-	201	-	383	-	446	-
		G	134	-	163	-	109	-	134	-	243	-	297	-
Large Settlements	10-20%	A	202	404	-	-	165	330	-	-	367	734	-	-
		D	215	430	242	484	176	352	198	396	391	782	440	880
		E	382	764	452	904	312	625	370	739	694	1388	822	1643
		F	422	843	490	981	345	690	401	802	767	1534	892	1783
		G	267	534	327	653	219	437	267	535	486	972	594	1188
Medium Settlements	5-10%	A	101	202	-	-	83	165	-	-	184	367	-	-
		D	108	215	121	242	88	176	99	198	196	391	220	440
		E	191	382	226	452	156	312	185	370	347	694	411	822
		F	211	422	245	490	173	345	201	401	383	767	446	892
		G	134	267	163	327	109	219	134	267	243	486	297	594
Small Settlements	5-10%	A	101	202	-	-	83	165	-	-	184	367	-	-
		D	108	215	121	242	88	176	99	198	196	391	220	440
		E	191	382	226	452	156	312	185	370	347	694	411	822
		F	211	422	245	490	173	345	201	401	383	767	446	892
		G	134	267	163	327	109	219	134	267	243	486	297	594

Notes to support the reading of Tables 5.6a and 5.6b.

- The **Settlement Category** relates to the 2019 settlement hierarchy tiers. See paras 5.14-5.26
- The **ranges** proposed are derived from Growth Option 3 as described at para 5.46. These describe the potential range of number of dwellings that each combination of factors imply.
- The **economic scenarios** are derived from the EDHNA and build upon the data summarised at Table 5.2
- The **Partial Catch-Up (PCU)** concept is explored at paras 5.8-5.9 and helps compensate for past lower household rates consequent to prior economic conditions.

5.49 At the same time, consideration of some major constraints will need to be applied to the growth expectations of settlements, which is likely to significantly reduce the growth that might actually come forward. These are:

- Flood risk – where a settlement is wholly at risk of flooding so that any likely development site would be in an area of flood risk; and
- Green Belt
- Cannock Chase Area of Outstanding Natural Beauty (AONB), Site of Special Scientific Interest (SSSI), Conservation Area and other designations.

Where these constraints apply to settlements their growth levels will be limited accordingly. Furthermore the capacity of existing infrastructure, services and facilities together with the viability of delivering new strategic infrastructure through new development will be a serious consideration.

#### **Growth Option 4: Focus all new development at the new Garden Community**

5.50 This growth option seeks to accommodate all of the Borough's housing and economic needs at the new Garden Community and provides for no other development elsewhere across the Borough.

5.51 This option is contrary to the NPPF as it does not allow the other settlements in the Borough to have any new development. It also fails to acknowledge the North Staffordshire Urban Area.

5.52 Owing to the lead in time and the significant infrastructure required to deliver any new settlement, it would not be able to deliver any new housing until very late into the plan period (post 2030 approximately). Therefore, sufficient land will need to be allocated in the Local Plan, to ensure that the Council has a rolling five-year land supply throughout the Plan Period.

#### **Growth Option 5: Disperse development across the new settlement hierarchy and also at the new Garden Community.**

5.53 Similar to option 3, this option would look at allocating development across all the settlements identified in the new Settlement Assessment as well as at the new Garden Community / settlement.

5.54 A variety of Reasonable Alternatives have been identified and initially assessed as being potentially suitable for development as a Garden Community or Major Urban Extension (AECOM Report<sup>27</sup>). Within this growth

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<sup>27</sup> <https://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base>

option at least one of the identified Reasonable Alternatives would be employed. The options identified by the study are shown by Table 5.7 below.

Table 5.7 Summary of Strategic Development location options

Strategic Growth Options	Gross Site (Hectares)	Net Developable Area (Hectares)	Estimated Homes	Estimated Jobs	Typology
Gnosall North / East	325	150	2,750 – 3,500	1,000 - 2,500	Urban Extension
Land between Gnosall & Haughton	325	150	2,500 – 3,250	1,000 - 2,500	Co-Dependent
Seighford	450	325	4,500 - 5,250	2,500 – 6,500	Co-Dependent
Land North of Redhill	1,000	300	3,500 - 5,000	2,500- 6,500	Co-Dependent
Meecebrook	1,125	650	9,000 - 11,500	8,000 - >15,000	Autonomous
Hixon	150	125	2,250 – 2,750	1,000 - 2,500	Urban Extension
Land East of Weston	225	100	1,750 – 2,000	1,000 - 2,500	Urban Extension

Derived from Table 12 of the AECOM report, p57<sup>28</sup>

- 5.55 Under this option it would be necessary to ensure that sufficient land is allocated within the Settlement Hierarchy until delivery at the new Garden Community commences. At which point the balance of delivery would shift to the new Garden Community.
- 5.56 The largest of the potential options for a Garden Community, Meecebrook, is capable of delivering more than 10,000 new houses and 75ha of employment land along with supporting infrastructure. However, as acknowledged above there is unlikely to be any dwellings completed until at least 2030, during which lead-in-time the Council will still need to ensure a five-year land supply.
- 5.57 This option would also identify sites of less than 1 hectare in accordance with the NPPF.

<sup>28</sup> <https://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base>

**Growth Option 6: Concentrate development within existing transport corridors / clusters of communities.**

- 5.58 This Option seeks to maximise the benefit of the existing transport network and other infrastructure. It looks to maximise the potential for new infrastructure development by building within and adjacent to the larger settlements, their connecting transport corridors and the associated settlements. This option has the potential for significant extension of communities or even new Garden Communities within those corridors.
- 5.59 There are a number of corridors / clusters that could be considered including:
- i. Gnosall – Haughton - Stafford (A518);
  - ii. Barlaston – Tittensor - Stone –Aston-by-Stone – Stafford (A34/M6);
  - iii. Croxton - Eccleshall – Great Bridgford – Cresswell – Stafford (B5026/A5013)
  - iv. Stone – Weston – Hixon - Great Hayward – Little Hayward (A51)
  - v. Norbury – Woodseaves – Eccleshall – Norton Bridge – Stone (A519/B5026)
- 5.60 This Option would require a mixture of large and smaller sites in order to enable the achievement of the authority’s rolling five-year land supply and NPPF compliance. Furthermore it would be likely to additionally require development within the main towns and other larger settlements within the settlement hierarchy.
- 5.61 Care would need to be taken not to overload the capacity of the existing infrastructure network, but the concentration of development within these key corridors would be efficient, although by its nature, this Option may lead to undesirable ribbon development. However, this approach might be appropriate where, in some under pressure / high demand settlements, the current Plan has led to greater levels of development than might be considered desirable.
- 5.62 Of the six growth options discussed above, which represent the possible reasonable alternatives for Stafford Borough three (Options 1, 2, and 4) could be considered contrary to NPPF. As such they are considered less appropriate and are proposed to be discarded.
- 5.63 The other three Options (Options 3, 5 and 6) are considered NPPF-compliant and provide a potential spatial basis for the development of the new Stafford Borough Local Plan 2020-2040 either in their own right or in combination.

## Question 5.H

- i) Do you agree that the only NPPF compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)?
- ii) If you do not agree what is your reason?
- iii) Do you consider there to be any alternative NPPF compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.

5.64 The following Tables 5.8A-5.8G look more closely at Options 3, 5 and 6 and their potential implications for the Borough's delivery of housing between 2020 and 2040, notwithstanding the constraints and other considerations highlighted previously. In the preparation of this report, at this early stage of the Plan it has been necessary to make a number of assumptions to aid this discussion:

- Option 3 is dependent on the 2019 Settlement Hierarchy. Accordingly, it does not employ any of the Garden Community alternatives.
- Options 5 and 6 will both utilise at least one of the Garden Community Reasonable Alternatives in their make-up and as such are considered together.
- It will be essential for the Borough to ensure a 5-year land supply throughout the 20-year Plan period. For the Options employing the Garden Communities (options 5 & 6), due to the lag in time between conception and commencement of delivery, unlike Option 3, it will be necessary to effectively split the Plan Period into two distinct Phases:
  - i. The first phase (2020-2030) will assume no contribution by the Garden Communities under consideration. Accordingly, during the first phase the Borough will be dependent on the delivery of housing via normal allocations etc;
  - ii. The second phase (2030-2040) will allow contributions by the new Garden Communities to be considered which, when combined with the other allocations, will meet the Borough's housing requirement. The contribution by a Garden Community / Major Urban Extension will, for the time being be uncertain but for these *illustrative* purposes will be based upon the anticipated delivery at a Garden Community / Major Urban Extension (or combination of two or more) with a total of up to 10,000 dwellings at a rate of 500 dwellings/year after 2030 (assumed to be the earliest that any delivery will occur). *It is important to note that should the delivery rate of the Garden Communities fall short of 500 dwellings per year then any shortfall would need to be made up within the settlements named in the 2019 Settlement Hierarchy.*

The following notes are provided to aid the understanding of Tables 5.8 A-G:

- The housing requirements are defined by the EDHNA economic scenarios
- In order to simplify the tables the housing requirements for each settlement hierarchy tier have been calculated to a mid-point rather than providing a range as in Table 5.6 “Elsewhere” comprises Tiers 3-6 of the 2019 Settlement Hierarchy
- Due to the large number of variables it has not been attempted to suggest the number of dwellings that might be allocated to settlements outside the main settlements of Stafford and Stone
- For Options 5 and 6 a delivery by the garden community (ies) of 500 dwellings / year post 2030 has been assumed; the balance of the housing requirement has been apportioned to the Settlement Hierarchy in the same proportions as in Option 3 (Stafford 60% / Stone 15% / Elsewhere 25%)
- For all Options where a discount is applied. In the second phase (2030-2040), a discount of 500 dwellings has been applied to take account of the houses that would have been erected in 2031, the final year of the current 2011-2031 Plan.

Table 5.8A - Economic Scenario A

Description	Economic Scenario A Spatial Option 3 No Garden Community			
	2020-2030		2030-2040	
Annual Dwelling Requirement	408 (n/a)			
Total Dwelling Requirement 2020-2040	8160 (n/a)			
	Phase requirement			
	2020-2030		2030-2040	
Note: with PCU figure shown in brackets	4,080 (n/a)		4,080 (n/a)	
	Anticipated Phase Requirement (Dwellings)			
	No Discount		With Discount	
	2020 -2030	2030-2040	2020-2030	2030-2040
Without PCU				
TOTAL:	4,080	4,080	0	3,580
Stafford 60%	2,448	2,448	0	2,148
Stone 15%	612	612	0	537
Elsewhere 25% <sup>26,27</sup>	1,020	1,020	0	895
With PCU				
TOTAL:	n/a	n/a	n/a	n/a
Stafford 60%	n/a	n/a	n/a	n/a
Stone 15%	n/a	n/a	n/a	n/a
Elsewhere 25%	n/a	n/a	n/a	n/a

Description	Economic Scenario A Spatial Options 5&6 With Garden Community			
	2020-2030		2030-2040	
Annual Dwelling Requirement	408 (n/a)			
Total Dwelling Requirement 2020-2040	8160 (n/a)			
	Phase requirement			
	2020-2030		2030-2040	
Note: with PCU figure shown in brackets	4080 (n/a)		4080 (n/a)	
	Anticipated Phase Requirement (Dwellings)			
	No Discount		With Discount	
	2020 -2030	2030-2040	2020-2030	2030-2040
Without PCU				
TOTAL	4,080	4,080	0	3,580
Stafford 60%	2,448	648	0	348
Stone 15%	612	162	0	87
Elsewhere 25% <sup>26,27</sup>	1,020	270	0	145
Garden Community(ies)		3,000		3,000
With PCU				
TOTAL	n/a	n/a	n/a	n/a
Stafford 60%	n/a	n/a	n/a	n/a
Stone 15%	n/a	n/a	n/a	n/a
Elsewhere	n/a	n/a	n/a	n/a
Garden Community(ies)	n/a	n/a	n/a	n/a

Table 5.8D - Economic Scenario D

Description	Economic Scenario D Spatial Option 3 No Garden Community			
	2020-2030		2030-2040	
Annual Dwelling Requirement	435 (489)			
Total Dwelling Requirement 2020-2040	8,693 (9,773)			
	Phase requirement			
	2020-2030		2030-2040	
Note: with PCU figure shown in brackets	4,347 (4,887)		4,347 (4,887)	
	Anticipated Phase Requirement (Dwellings)			
	No Discount		With Discount	
	2020 -2030	2030-2040	2020-2030	2030-2040
Without PCU				
TOTAL:	4,347	4,347	0	3,847
Stafford 60%	2,608	2,608	0	2,308
Stone 15%	652	652	0	577
Elsewhere 25% <sup>26,27</sup>	1,087	1,087	0	962
With PCU				
TOTAL:	4,887	4,887	0	4,387
Stafford 60%	2,932	2,932	0	2,632
Stone 15%	733	733	0	658
Elsewhere 25%	1,222	1,222	0	1,097

Description	Economic Scenario D		Spatial Options 5&6		With Garden Community
Annual Dwelling Requirement	435 (489)				
Total Dwelling Requirement 2020-2040	8,693 (9,773)				
	Phase requirement				
	2020-2030		2030-2040		
Note: with PCU figure shown in brackets	4,347 (4,887)		4,347 (4,887)		
	Anticipated Phase Requirement (Dwellings)				
	No Discount		With Discount		
	2020 -2030	2030-2040	2020-2030	2030-2040	
Without PCU					
TOTAL	4,347	4,347	0	3,847	
Stafford 60%	2,608	808	0	508	
Stone 15%	652	202	0	127	
Elsewhere 25% <sup>26,27</sup>	1,087	337	0	212	
Garden Community(ies)	0	3,000	0	3,000	
With PCU					
TOTAL	4,887	4,887	0	4,387	
Stafford 60%	2,932	1,132	0	832	
Stone 15%	733	283	0	208	
Elsewhere 25%	1,222	472	0	347	
Garden Community(ies)	0	3,000	0	3,000	

Table 5.8E - Economic Scenario E

Description	Economic Scenario E Spatial Option 3 No Garden Community			
	2020-2030		2030-2040	
Annual Dwelling Requirement	647 (711)			
Total Dwelling Requirement 2020-2040	12,942 (14,215)			
	Phase requirement			
	2020-2030		2030-2040	
Note: with PCU figure shown in brackets	6,471 (7,108)		6,471 (7,108)	
	Anticipated Phase Requirement (Dwellings)			
	No Discount		With Discount	
	2020 -2030	2030-2040	2020-2030	2030-2040
Without PCU				
TOTAL:	6,471	6,471	471	5,971
Stafford 60%	3,883	3,883	283	3,587
Stone 15%	971	971	71	896
Elsewhere 25% <sup>26,27</sup>	1,618	1,618	118	1,493
With PCU				
TOTAL:	7,108	7,108	1,108	6,608
Stafford 60%	4,265	4,265	665	3,965
Stone 15%	1,066	1,066	166	991
Elsewhere 25%	1,777	1,777	277	1,652

Description	Economic Scenario E Spatial Options 5&6 With Garden Community			
	2020-2030		2030-2040	
Annual Dwelling Requirement	647 (711)			
Total Dwelling Requirement 2020-2040	12,942 (14,215)			
	Phase requirement			
	2020-2030		2030-2040	
Note: with PCU figure shown in brackets	6,471 (7,108)		6,471 (7,108)	
	Anticipated Phase Requirement (Dwellings)			
	No Discount		With Discount	
	2020 -2030	2030-2040	2020-2030	2030-2040
Without PCU				
TOTAL	6,471	6,471	471	5,971
Stafford 60%	3,881	2,082	282	1,783
Stone 15%	971	521	71	446
Elsewhere 25% <sup>26,27</sup>	1,618	868	118	743
Garden Community(ies)	0	3,000	0	3,000
With PCU				
TOTAL	7,108	7,108	1,108	6,608
Stafford 60%	4,265	2,465	665	2,165
Stone 15%	1,066	616	166	541
Elsewhere	1,777	1,027	277	902
Garden Community(ies)	0	3,000	0	3,000

Table 5.8F - Economic Scenario F

Description	Economic Scenario F Spatial Option 3 No Garden Community			
	2020-2030		2030-2040	
Annual Dwelling Requirement	683 (746)			
Total Dwelling Requirement 2020-2040	13,668 (14,915)			
	Phase requirement			
	2020-2030		2030-2040	
Note: with PCU figure shown in brackets	6,834 (7,458)		6,834 (7,458)	
	Anticipated Phase Requirement (Dwellings)			
	No Discount		With Discount	
	2020 -2030	2030-2040	2020-2030	2030-2040
Without PCU				
TOTAL:	6,834	6,834	834	6,334
Stafford 60%	4,100	4,100	500	3,800
Stone 15%	1,025	1,025	125	950
Elsewhere 25% <sup>26,27</sup>	1,709	1,709	209	1,583
With PCU				
TOTAL:	7,458	7,458	1,458	6,958
Stafford 60%	4,475	4,475	875	4,175
Stone 15%	1,119	1,119	219	1,044
Elsewhere 25%	1,864	1,864	364	1,739

Description	Economic Scenario F Spatial Options 5&6 With Garden Community			
Annual Dwelling Requirement	683 (746)			
Total Dwelling Requirement 2020-2040	13,668 (14,915)			
	Phase requirement			
	2020-2030		2030-2040	
Note: with PCU figure shown in brackets	6,834 (7,458)		6,834 (7,458)	
	Anticipated Phase Requirement (Dwellings)			
	No Discount		With Discount	
	2020 -2030	2030-2040	2020-2030	2030-2040
Without PCU				
TOTAL	6,834	6,834	834	6,334
Stafford 60%	4,100	2,300	500	2,000
Stone 15%	1,025	575	125	500
Elsewhere 25% <sup>26,27</sup>	1,709	959	209	834
Garden Community(ies)	0	3,000	0	3,000
With PCU				
TOTAL	7,458	7,458	1,458	6,958
Stafford 60%	4,475	2,675	875	2,375
Stone 15%	1,119	669	219	594
Elsewhere	1,864	1,114	364	989
Garden Community(ies)	0	3,000	0	3,000

Table 5.8G - Economic Scenario G

Description	Economic Scenario G Spatial Option 3 No Garden Community			
	2020-2030		2030-2040	
Annual Dwelling Requirement	540 (597)			
Total Dwelling Requirement 2020-2040	10,798 (11,939)			
	Phase requirement			
	2020-2030		2030-2040	
Note: with PCU figure shown in brackets	5,399 (5,970)		5,399 (5,970)	
	Anticipated Phase Requirement (Dwellings)			
	No Discount		With Discount	
	2020 -2030	2030-2040	2020-2030	2030-2040
Without PCU				
TOTAL:	5,399	5,399	0	4,899
Stafford 60%	3,239	3,239	0	2,939
Stone 15%	810	810	0	735
Elsewhere 25% <sup>26,27</sup>	1,350	1,350	0	1,225
With PCU				
TOTAL:	5,970	5,970	0	5,470
Stafford 60%	3,582	3,582	0	3,282
Stone 15%	896	896	0	820
Elsewhere 25%	1,492	1,492	0	1,368

Description	Economic Scenario G Spatial Options 5&6 With Garden Community			
	2020-2030		2030-2040	
Annual Dwelling Requirement	540 (597)			
Total Dwelling Requirement 2020-2040	10,798 (11,939)			
	Phase requirement			
	2020-2030		2030-2040	
Note: with PCU figure shown in brackets	5399 (5970)		5399 (5970)	
	Anticipated Phase Requirement (Dwellings)			
	No Discount		With Discount	
	2020 -2030	2030-2040	2020-2030	2030-2040
Without PCU				
TOTAL	5,399	5,399	0	4,899
Stafford 60%	3,239	1,439	0	1,139
Stone 15%	810	360	0	285
Elsewhere 25% <sup>26,27</sup>	1,350	600	0	475
Garden Community(ies)	0	3,000	0	3,000
With PCU				
TOTAL	5,970	5,970	0	5,470
Stafford 60%	3,582	1,782	0	1,482
Stone 15%	896	446	0	370
Elsewhere	1,492	742	0	618
Garden Community(ies)	0	3,000	0	3,000

5.65 Whilst these data can, at this stage, only be considered illustrative it does serve to show a number of key implications in respect of the apparent housing requirement and delivery profile:

- The impact of employing a discount to take account of the anticipated delivery arising from the current Plan in the “crossover period” (2020-2031) of the Plans is very considerable and such a discount would remove a great deal of pressure on the existing settlements in the first 10 years of the New Plan;
- Similarly, should a Garden Community / Major Urban Extension (or combination of Garden Community / Major Urban Extensions) be employed in the New Plan, these have the potential (*depending on their delivery rates*) to remove a considerable amount of pressure from the existing settlements in the last ten years of the Plan (post 2030) when the delivery of those new communities would start in earnest.

- 5.66 This narrative has not considered the implications of any requests that might be made under the Duty to Cooperate by other Local Planning Authorities to accommodate housing requirements that cannot be accommodated within their own boundaries. Any such provision made by Stafford Borough Council would be in addition to the provision made for this Council's own requirement.

**Question 5.I**

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

**Question 5.J**

What combination of the four factors:

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

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

- 5.67 The make up of the housing requirement (affordable housing, special groups, etc.) is further considered by Section 8 of this document.

**Delivering a sufficient supply of Employment Land**

- 5.68 As set out earlier the delivery of new housing provision through the new Plan relies on new economic growth and jobs provided to ensure economic and employment needs are met, and that the Borough's growth agenda is facilitated. Indeed, the NPPF states that:

“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”<sup>29</sup>.

- 5.69 Stafford Borough Council recognises the very strong crossover of this section and its aims with the Stoke on Trent and Staffordshire Local Enterprise Partnership's Strategy<sup>30</sup>; the Constellation Partnership's HS2 Growth

<sup>29</sup> NPPF para 80

<sup>30</sup> <https://www.stokestaffslep.org.uk/app/uploads/2019/01/SSLEP-Strategic-Economic-Plan-April-2018-.pdf>

Strategy<sup>31</sup> (previously known as the Northern Gateway Development Zone); and Stafford Borough's own Economic Growth Strategy. *This Plan will intend to facilitate the development appropriate to these strategies' success within the necessary constraints of balanced, sustainable development.*

- 5.70 This employment land element, as with the dwelling-focussed part of this section, will consider the economy and employment findings of the EDHNA<sup>32</sup> and will consider their implications for the provision of employment land. The arising issues are considered in greater detail in Sections 6 (Delivering Economic Prosperity) and 7 (Delivering Town Centres that address Future Needs).
- 5.71 The Stafford Borough Economic and Housing Development Needs Assessment (EHDNA) considers the future employment land requirements and, as with housing, provides a number of scenarios<sup>33</sup>:
- Scenario 1 – Cambridge Econometrics (CE) Economic Forecasts (Nov 2018);
  - Scenario 2 – CE Regeneration/Job Growth “policy on”
  - Scenario 3 – Policy on – 50% boost
  - Scenario 4 – Past trends jobs growth
  - Scenario 5 – Labour supply arising from the Government's approved methodology for the determination of housing need (408 dw/ann)
  - Scenario 6 – Past Take Up Rates.
- 5.72 Following full consideration within the EHDNA the report proposes a series of Gross Employment Land requirements for 2020-2040. These are summarised in Table 5.9.

<sup>31</sup> <http://constellationpartnership.co.uk/wp-content/uploads/2018/11/hs2-growth-strategy-report-oct-2018.pdf>

<sup>32</sup> <https://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base>

<sup>33</sup> For full details of these scenarios please refer to Part 3 of the EDHNA document

Table 5.9 Stafford Borough Gross Employment Land Comparisons 2020-2040<sup>34</sup>

Scenario		Requirement (ha)			
		B1a/b	B1c/B2	B8	Total
CE Baseline	2020-2040 (net)	0.53	-2.70	6.56	4.39
	2020-2040 (gross)				52.59
	+ Flexibility factor				69.07
CE Regeneration	2020-2040 (net)	11.53	18.51	14.10	44.14
	2020-2040 (gross)				92.34
	+ Flexibility factor				108.82
CE 50% Boost	2020-2040 (net)	1.66	-0.34	12.56	13.88
	2020-2040 (gross)				62.08
	+ Flexibility factor				78.56
Past trends jobs growth	2020-2040 (net)	3.27	5.10	21.12	29.50
	2020-2040 (gross)				77.70
	+ Flexibility factor				94.18
Local Housing Need 408dw/ann	2020-2040 (net)	0.33	-3.11	5.50	3.30
	2020-2040 (gross)				51.49
	+ Flexibility factor				67.98
Past take up rates	2020-2040 (net)	-17.86	91.20		116.64
	2020-2040 (gross)				164.84
	+ Flexibility factor				181.32

5.73 The EHDNA's appraisal of these scenarios led to a recommendation that Stafford Borough's B-Class employment land objectively assessed need should range from 68ha to 181ha between 2020 and 2040.

5.74 The EDHNA further recommended a split between the classes over the 2020-2040 plan period as follows:

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

5.75 In projecting future requirements for employment land, the EDHNA makes an allowance for the replacement of future losses of employment land. This

<sup>34</sup> See Table 7.19 of the EDHNA

allowance reflects the fact that some existing employment land will be recycled into other uses over the twenty year plan period. The EDHNA recommends an allowance for future losses replacement of 2.41 ha of employment land annually, or 48.2 ha over the 20-year plan 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?  
If not, please explain why.

5.76 The current Local Plan, via Policy SP5, gives targets for the spatial distribution of employment growth as:

- Stafford 56%
- Stone 12%
- Rest of Borough 32%

Policies E2 and E3 of the adopted Plan for Stafford Borough steer development outside of Stafford and Stone mainly to the Recognised Industrial Estates. The current Recognised Industrial Estates are:

- Hixon
- Hixon Airfield, Hixon
- Ladfordfields, Seighford
- Moorfields, Cotes Heath
- Pasturefields, Hixon
- Raleigh Hall, Eccleshall.

5.77 In common with housing, whether or not Stafford Borough chooses to go forward with a new Garden Community / Major Urban Extension would have major implications for the location of new employment land and its overall impact on the existing settlements. In determining the proportional distribution should a Garden Community be taken forward it is considered important by the Council to ensure that the Borough's main towns of Stafford and Stone continue to be supported in their respective economic roles. Similarly, in the event of a Garden Community being taken forward, the new settlement's

economic role would need to be underpinned by the provision of a suitable volume of employment land. Table 5.10 illustrates how the distribution of employment land might be influenced by the absence or presence of a Garden Community / Major Urban Extension within the new Plan for Stafford Borough.

Table 5.10 Illustrative distribution of employment land without and with a Garden Community / Major Urban Extension

Scenario		Proportion of Emp. Land %	Range of requirement		Overall range
			Requirement set at 68ha	Requirement set at 181ha	
No Garden Community	Stafford	50 - 70	34 - 48	91 - 127	34 - 127
	Stone	10 - 20	7 - 14	18 - 36	7 - 36
	Rest of Borough	10 - 40	7 - 27	18 - 72	7 - 72
With Garden Community	Stafford	30 - 50	20 - 34	54 - 91	20 - 91
	Stone	5 - 10	3 - 7	9 - 18	3 - 18
	Rest of Borough	0	0	0	0
	Garden Community	40 - 65	27 - 44	72 - 118	27 - 118

#### Question 5.N

Do you consider the employment distribution proposed by Table 5.9 for a New Plan without and with a Garden Community / Major Urban Extension to be reasonable?

If not please explain your reasoning.

- 5.78 It can be seen from Table 5.10 that, within the range of employment land requirements recommended by the EDHNA, the introduction of a Garden Settlement (where employment land is factored in at the master-planning stage) has a significant impact on the amount of employment land that would need to be identified in the settlements of the Settlement Hierarchy.

#### Methodology for selection of Settlement Boundaries and potential Site Options

- 5.79 At this stage it is important to stress that no decisions have yet been made about the location of new development. The purpose of this section is to start to explore where future development might go in the Borough as a whole and within each of the individual settlements.

- 5.80 Sites that have been submitted to Stafford Borough Council via the “Call for Sites” for consideration for Housing and Employment development are detailed at the Borough’s Strategic Housing and Employment Land Availability Assessment (SHELAA)<sup>35</sup>. The SHELAA presents an assessment of all sites that have been proposed to the Borough and comes to a view of their potential suitability. It is important to note that, even if a site is assessed as suitable for development, this does not necessarily mean that a site will be eventually proposed for allocation for development. In proposing sites for allocation the Council will need to take into account a wide range of factors including the wider evidence base and whether or not the site would contribute positively to achieving the spatial strategy that emerges from the Plan-making process. There will be a consultation on the matter of potential sites to support the preparation of the Stafford Borough New Local Plan 2020-2040 Preferred Option consultation document.

#### Question 5.O

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

If so please provide details via a “Call for Sites” form\*

\* <https://www.staffordbc.gov.uk/node/227026>

- 5.81 In order to identify potential settlement boundaries and options for where new development might be located it is important to set out the context and methodology used. Therefore the new Local Plan offers the opportunity to review the existing adopted settlement boundaries through the Plan for Stafford Borough: Part 2 and ‘made’ Neighbourhood Plans in order to create new settlement boundaries to those villages identified in the new settlement hierarchy.
- 5.82 The purpose of the settlement boundary is to define the built limits of a settlement and differentiate between what is considered the built form of a settlement where the principle of development is usually acceptable and the countryside where development is strictly controlled. Therefore, settlement boundaries guide development to sustainable locations demarking a concentration of existing residential and employment premises, and services and facilities. In addition, they provide clarity and certainty for developers and the general public by highlighting the areas which will be more acceptable than others for new built development.
- 5.83 It must be noted that the settlement boundary is a planning designation only and has no other administrative relevance. Settlement boundaries do not necessarily reflect land ownership boundaries, parish boundaries or the exact

<sup>35</sup><https://www.staffordbc.gov.uk/strategic-housing-land-availability-assessment-shlaa1>

curtilages of dwellings. Whilst it is considered that the principle of built development within the settlement boundary is usually acceptable, this does not automatically grant planning permission to such a proposal or mean the Local Planning Authority will grant planning permission. All proposals, whether specifically identified at a site allocated for new development or land falling within the settlement boundary, must conform to relevant policies in the New Local Plan. Adopting a new settlement boundary will help to protect countryside land outside of the settlement area, whilst also ensuring that there continues to be sufficient land identified to deliver a five-year supply of housing land.

Tier	Settlement Category	Description
1	Stafford	Largest urban area in the Borough with a regionally significant service centre role providing employment, retail and other facilities, and a key role in driving growth. This also includes Baswich, Berkswich, Doxey and Walton-on-the-Hill.
2	Stone	The second largest town in the Borough, providing employment, retail and other facilities for a wider area
3	North Staffordshire Urban Areas	These areas are located in the north of the Borough and include Clayton; Meir Heath / Rough Close; and Blythe Bridge.
4	Large Settlements	Eccleshall; Gnosall; Great Haywood; Hixon; Little Haywood and Colwich
5	Medium Settlements	Brocton A34; Church Eaton; Derrington; Great Bridgeford; Haughton; Hilderstone; Hyde Lea; Weston; Woodseaves.
6	Small Settlements	Adbaston; Aston-by-Stone; Bradley; Cold Meece; Cotes Heath; Creswell; Croxton; Hopton; Milwich; Moreton; Norbury; Norton Bridge; Ranton; Sandon; Salt; Seighford.

- 5.84 As detailed in the Development Strategy section, the proposed new settlement hierarchy for Stafford Borough includes the following areas, as set out below:
- 5.85 All other settlements with fewer than 50 dwellings or where there is no clearly definable village nucleus that do not fall within any of the above categories should be regarded as being part of the 'Rest of the Borough', and therefore are not identified with a proposed settlement boundary or new site options for future development.

## 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.

- 5.86 National policy is clear that the preparation of new Local Plans must provide sufficient land to meet future development requirements for the area. In particular paragraph 68 of the NPPF sets out the small and medium sized sites provide an important contribution to meeting the housing requirement of an area, to be facilitated through a good mix of sites including 10% of future provision to be on sites no larger than one hectare. Furthermore, the NPPF and Planning Practice Guidance (PPG) identify the need for certain specific policy boundaries, with town centres for retail-planning purposes and Green Belt.
- 5.87 In addition the NPPF provides guidance around the approach to development within rural areas, stating that “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services’ (Para. 78). Paragraph 79 seeks to avoid the development of isolated homes in the open countryside.
- 5.88 Nevertheless the NPPF is largely silent on any specific requirement about the approach for establishing settlement boundaries. There is no set guidance within the NPPF or PPG on how to review settlement policy boundaries so it therefore falls to local planning authorities (LPAs) to consider what is appropriate in terms of development within various settlements and the resultant need for specific boundaries around settlements.
- 5.89 Within this context the following methodology will be used to prepare the proposed boundaries and identify site options at a subsequent stage of consultation through the New Local Plan for Stafford Borough.
- 5.90 The concept of settlement boundaries is to draw a policy line which separates built-up areas (within which development is, in principle, acceptable), from the countryside (within which, with limited exceptions, development is not acceptable). As a starting point the settlement boundaries are based on the settlement boundaries that have previously been drawn for the Plan for Stafford Borough Part 2 (adopted 2017) and the criteria set in adopted Spatial Principle 7, together the Methodology section of the PFSB Part 2 (adopted

2017). Therefore, the review and establishing new settlement boundaries will follow a three-stage process:

### Stage 1 - Desktop Review

5.91 Using the settlement boundaries established in the PFSB (adopted 2017) and the previous Stafford Borough Local Plan (adopted 1998) as a base, a desktop study of the mapped area was undertaken to collect data on current land and built form, land-use, landscape character, woodland cover, field pattern and settlement pattern using GIS and aerial photographs. This exercise considered the following constraints which allowed the landscape to be more easily surveyed in the field and gain a clearer understanding of the potential settlement boundary:

Green Belt	Green Infrastructure	Open space/playing field	Sites with planning permission
Public Right of Way	Site of Biological Importance	Special Area of Conservation	Historic Environment Record
Conservation Area	Listed Buildings	Contaminated/Land Stability	Landfill and Historic Landfill
Flood Plain	Mineral Deposits	Utilities	Local Green Space
Proposed High Speed 2 (HS2)	Sites of Special Scientific Interest (SSSI)	Neighbourhood Plan boundaries	RAMSAR sites of international nature conservation

### Stage 2 - Site Visits

5.92 Following the Desktop Review site visits took place for each settlement across Stafford Borough to consider the form and character of the settlement. Furthermore, the fieldwork collected data relating to land and built form, land-use, vegetation, field boundaries together with scale, enclosure and visual unity. This enabled the settlement boundaries to be identified relating to urban or rural form, the degree of permanence, as well as understanding the condition of landscape features.

### Stage 3 – incorporation of Development Principles

5.93 Together with the Development Principles set out below (paras 5.92-5.96) the information derived from stages 1 and 2 will be used to identify:

- a) the proposed new settlement boundaries; and
- b) the site options for potential new development at each settlement.

### **Development Principle 1: Recognised physical features and land uses**

- 5.94 Settlement boundaries should be logical and easily identifiable, normally following property boundaries. It is proposed to include areas of land which are physically related to the settlement including residential, employment and community buildings. Former farm buildings converted to other uses adjacent to a settlement were assessed on a site by site basis, taking into account defensible boundaries and the age of the building – i.e. how established it is within the settlement. The boundary will be defined around the built form of settlements and where possible follows defined features such as walls, fences, hedgerows, roads, canals and woodland. The curtilages of buildings which are contained, closely relate to the character of the built form, have enclosing features, and are separated from the open countryside.
- 5.95 Settlement boundaries exclude open areas of land (public open space, allotments, school playing fields) on the edges of settlements unless appropriate for general development. Operational development in relation to schools and public utilities can be exceptions to policy. However, areas of proposed Local Green Spaces will be included for consideration. In additional boundaries will be drawn around school and utility buildings; include hardstanding such as hard surface playfields as they are built development.
- 5.96 Rural exception sites on the edge of settlements will not be included within the settlement boundaries, but their locations will be identified. This is to ensure that they are not converted into market housing.

### **Development Principle 2: Sites with Planning permission and Land Exclusions**

- 5.97 Settlement boundaries will include existing commitments i.e. unimplemented permissions and implemented permissions as well as small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing urban area, taking account of any environmental development constraints. Nevertheless, settlement boundaries exclude:
- i. Isolated development which is physically or visually detached from the settlement.
  - ii. Sections of large curtilages of buildings (including gardens) which relate more to the character of the countryside than the built form. Where

- possible and to maintain continuity, exceptionally long gardens will follow the boundaries of adjacent properties with smaller curtilages.
- iii. Agricultural farmsteads, horticultural nurseries, equestrian facilities where not well related and which stand on the edge of the built form of settlements.
  - iv. Important gaps e.g. where a settlement is fragmented, the open gaps between developed areas should be retained.
  - v. Camping and caravanning sites (including Gypsy, Travellers and Travelling Showpeople pitches) except where in year-round permanent residential use and related to existing built form.

**Development Principle 3: Settlement Boundaries do not need to be continuous**

- 5.98 In certain cases the nature and form of a settlement is defined into two or more separate elements. These detached areas of a settlement will have boundaries drawn around them, where they form a cluster of houses; comprising a continuous block of curtilages which are in close proximity to one another; and do not have any identity as a separate settlement or hamlet. Where boundaries are drawn around detached parts of settlements, this will not have any implications for land lying outside the boundary between the main part of the settlement and the detached part.

**Question 5.Q**

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

## 6. Delivering Economic Prosperity



Prime Point Business Park, Stafford

## Section 6 Delivering Economic Prosperity

- 6.1 Facilitating the creation of a prosperous economy is an important objective of plan making. The provision of high quality employment land works to attract business and enterprise to an area, which in turn creates and diversifies employment opportunities, increases the addition of value and ultimately strengthens the local economy. This echoes the vision of the emerging Stafford Borough Economic Growth Strategy which supports an ambitious yet sustainable economy. To deliver this vision it is stated by the Strategy that the Council and partners will focus on five key priorities:
- 1) Enabling new and existing businesses to grow and build confidence in Stafford as a hub of productivity with a balanced economy
  - 2) Leading on the delivery of infrastructure led commercial and housing growth to shape Stafford as the best place to invest
  - 3) Understanding and unlocking the economic growth opportunities in our rural areas
  - 4) Developing access to lifelong learning to create a local workforce with specialist skills that can respond to our ambitions for growth
  - 5) Taking pride in our County town status and maximising our visitor offer across the Borough.
- 6.2 The NPPF acknowledges the importance of building a strong and competitive economy<sup>36</sup>, and stipulates that planning policies should help to create the conditions in which businesses can invest and expand. Further to this, it also emphasises that focus should be placed on creating prosperous economies in both urban and rural areas<sup>37</sup>.
- 6.3 Stafford Borough's central location and the excellent transport links serves to predispose Stafford as a desirable and attractive location for businesses from a range of sectors. However, to optimise the economic potential of Stafford Borough, the Council must ensure the provision of a diverse portfolio of employment land and buildings.
- 6.4 Throughout the next plan period, Stafford Borough will see a level of housing growth which will provide an opportunity for the creation of new jobs and the diversification and enhancement of the local economy. However, for this to be achieved, the Council must ensure the delivery of employment land in the most appropriate places, which caters for a diverse range of employment sectors. Therefore, the new Local Plan must consider how to enable this through a suite of suitable land allocations and economic policies. For the

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<sup>36</sup> NPPF Para 80

<sup>37</sup> NPPF Paras 83-84

purposes of this document “employment” is defined as including Offices (B1a/b), Industrial (B1c/B2) and Distribution (B8).

## **Providing the Right Land and Buildings for Employment**

6.5 Stafford Borough’s forecasted housing growth over the coming years requires a commensurate increase in job provision. To ensure adequate jobs are available to the present and future residents of the Borough, economic development and adaptation must increase. Therefore, ensuring adequate land is made available for a variety of economic premises is crucial in supporting the growing population, responding to future changes in economic structure whilst guaranteeing a prosperous future economy.

### **Employment Space**

6.6 The recently conducted Economic and Housing Needs Assessment (EDHNA) states, that at present, there is an approximately 1,245,000m<sup>2</sup> of floor space in the Borough<sup>38</sup>. As the largest and second largest settlements within the Borough, the majority of this floor space is found within Stafford and Stone. This is particularly true for industrial employment, where the majority of sites are located in Stafford. However, there are a number of important employment premises distributed throughout the rural areas of the Borough which all make valuable contributions to the economic prosperity of the Borough.

6.7 The EDHNA provides forecasts that the future increase in floor space which would be required to satisfy the economic needs of the Borough. This found that, depending on the scenario used for the forecast, between 17,548m<sup>2</sup> and 176,548m<sup>2</sup> of additional employment floor space would need to be provided between the years 2020 and 2040 (Table 6.1)

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<sup>38</sup> <https://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base>

Table 6.1 Summary of employment and employment space requirements (2020-2040)<sup>39</sup>

	Scenario 1 Base Cambridge Econometrics (Nov 2018)	Scenario 2 CE Job Growth: Policy on	Scenario 4 Past Trends Jobs Growth
Change in jobs (2020-40)	+ 5,929	+ 12,473	+ 13,128
Floorspace requirement (2020-40) (m2)			
Offices (B1a/b)	+ 2,103	+ 46,135	+ 13,100
Industrial (B1c/B2)	- 10,779	+ 74,032	+ 20,413
Distribution (B8)	+ 26,224	+ 56,401	+ 84,494
Total (m2)	+ 17,548	+ 176,568	+ 118,007

- 6.8 Scenario 1 (Table 6.1) is effectively “policy-off” with varying assumptions built in, a forecast based on the projection of past trends. In looking forward to the future economy of Stafford Borough it is therefore important to also consider the economic strategies of the Borough and Stoke-on-Trent and Staffordshire Local Enterprise Partnership. This consideration will assist in the assessment of whether the projections will provide suitable accommodation for the changing nature of businesses during the new Plan Period of 2020-40.
- 6.9 Stafford Borough has a long history of employment dominated by public sector (including health) and manufacturing employment. In recent years there has been a shift towards wholesale and retail, business support, professional services and the visitor economy with the remaining manufacturing becoming higher value-added in nature. It is the Borough’s intention to build upon these trends and to capitalise on its significant strengths (particularly the higher skills possessed by the population and the Borough’s connectivity with the rest of the country) in order to maximise the number of jobs coming into the area and to achieve a higher value-added of those jobs. Examples of this might be to work with the local universities to achieve higher tech activities in technology and manufacturing or to gain Head / Regional Office functions building upon the potential benefits of HS2.
- 6.10 There will, therefore, be a need to allocate employment land in the new Local Plan and for this to be sufficiently flexible in nature so that the evolving needs and demands of the economy can be accommodated. Similarly, the floor space will need to be allocated within the Borough where it has most benefit to existing and potential employers.

<sup>39</sup> Derived from the Economic and Housing Development Needs Assessment 2019

- a) Allocate employment land so that it extends existing employment premises / areas in the Borough?
- b) Allocate employment in both urban and rural areas?

**Question 6.C**

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

**Question 6.D**

In allocating employment land should the Council \_\_\_\_\_ 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

- 6.11 Safeguarding existing employment premises from redevelopment to residential uses is one way of ensuring employment opportunities are maintained within the Borough.

**Question 6.E**

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.

**Type of Employment**

- 6.12 To continue to encourage inward investment into the Borough of Stafford in the next plan period, the Borough needs to ensure it has made suitable provision to create a commercial property market suitable for potential investors. To do this, it is important to understand the type of employment that the commercial property market must cater for.

- 6.13 At present, the main bulk of employment in Stafford is made up across the wholesale and retail trade, health and social care services, manufacturing,

accommodation and food services. However, the EDHNA suggests some sectoral changes during the plan period. For example, the manufacturing sector has recently seen a decrease in the number of employees. This trend is forecast to continue in the future. However, there are a number of sectors which have seen strong levels of growth in recent years, with forecasts suggesting that their growth will continue. These sectors include warehousing and postal, business support services and health. Further sectors forecast to grow in the Borough include business support and construction. The Council will therefore seek to encourage growth of current businesses and inward investment from these sectors by ensuring appropriate land and premises is made available to them.

- 6.14 The economic profile of Stafford Borough is diverse, with employment sectors ranging from hospitality to large scale manufacturing. Maintaining this variety and ensuring a range of employment opportunities are available to the residents of Stafford, premises suitable for all potential investors and current businesses looking to expand must be provided.
- 6.15 A significant barrier to growth of existing businesses, and to inward investment, is the lack of suitable units. A lack of suitability may be defined by size, location and nature of the site and unit. The recently conducted EDHNA highlights a shortage of smaller units suitable for small and medium sized enterprises. If this isn't resolved there is potential for imbalances in the employment type will prevail whilst at the same time curtailing growth opportunity in the Borough. To address this problem, the number of small and medium units available within the Borough must increase.

#### Question 6.F

- a) Where do you consider small and medium size units should be made available?
- b) Do you consider there are any other issues relating to building type and size which may be potentially restricting economic opportunity within the Borough?

Please explain the rationale for your answer.

#### Question 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.

## Office Space

6.16 The EDHNA suggests that some town centre office spaces are no longer fit for purpose due to a lack of suitable infrastructure including, in some areas, fibre optic broadband. Instead, office space situated at business parks out of town are now increasing in popularity due to their access to fibre optic broadband and open plan office space. However, such premises are seemingly lacking within the Borough, and thus to increase inward investment from businesses which require such infrastructure into the Borough, there is a need to increase the provision of more modern and high-quality office space.

## Employment in Rural Areas

6.17 Stafford is a predominantly rural Borough. Accordingly employment in rural areas makes a significant contribution to its total workforce. Some 4,000 of Stafford Borough's businesses are based in the rural areas outside of Stafford and Stone. Ensuring the longevity of these businesses, and recognising the important contribution they make to the economy of Stafford Borough, must therefore be an intrinsic focus of the economic objectives of the new Local Plan. Similarly, the new Local Plan should aim to help facilitate the diversification of existing rural businesses and welcoming of new ones.

6.18 The importance of supporting a prosperous rural economy is emphasised by the NPPF. Here it is stated that planning policies should enable<sup>40</sup> the:

- sustainable growth of all types of business in rural areas;
- development and diversification of agriculture; and
- developments of tourism and leisure facilities.

6.19 There are a number of ways in which the Local Plan can seek to enable these factors. For example, ensuring all business premises are served by super-fast broadband means that rural businesses always have adequate internet access, allowing for their efficient operation, with further details in the Connections section (Section 12). Further to this, the development of rural "hubs" which can be used as a working space by the staff members of multiple businesses can increase flexible working practice opportunities, enhancing the experience of rural workforces.

6.20 The EDHNA identified a lack of suitable premises as one of the main barriers to the expansion of businesses. This will constrain the expansion or creation of rural businesses or the ability to relocate within their area of choice.

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<sup>40</sup> NPPF Para 83

- 6.21 The currently adopted Plan for Stafford Borough provides policy to encourage sustainable rural development within the Borough in Policy E2. However, the new Local Plan could propose further measures to further support the rural economy.

**Question 6.H**

To assist the rural economy should the Council:

- a) Allocate land for employment purposes throughout the rural areas of the Borough?
- b) If so, which area(s) do you consider would be appropriate for this purpose?

Extend existing rural business parks?

If so, which ones?

**Question 6.I**

To assist the rural economy should the Council:

- a) Seek to allow for the expansion of rural business premises where this might be otherwise restricted by the relevant planning policies? Should there be any restrictions or conditions to such expansion?
- b) Propose a policy stipulating the installation of super fast broadband to all new business development in the rural areas of the Borough?

**Question 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?

**Major Developed sites in the Green Belt.**

- 6.22 NPPF sets out the commitment to maintaining Green Belts to prevent urban sprawl by keeping land permanently open to five key purposes. As previously discussed (para 5.23 - 5.26), there is not an intention to review the Green Belt areas in Stafford Borough. The current North Staffordshire Green Belt and Policy E5 recognise a number of significant brownfield sites within the Green Belt which are encouraged for limited infill or the partial or complete redevelopment site, for employment purposes. These are:

- Hadleigh Park, Blythe Bridge
- Moorfields Industrial Estate, Cotes Heath
- Former Meaford Power Station, Meaford, Stone.

**Question 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.

## Visitor Economy

- 6.23 The Destination Staffordshire Partnership Strategy<sup>41</sup> and Stafford Borough Corporate Business Plan<sup>42</sup> both recognise the increasing economic importance to the Borough of the visitor economy. This is further reflected by the Stoke on Trent and Staffordshire Enterprise Partnership's Strategic Economic Plan<sup>43</sup> (SEP), which identifies the visitor economy as a growth sector valuing it at £1.6bn (County-wide). The emerging Stafford Borough Economic Growth Strategy recognises the Borough's Visitor Economy sector as being worth £222m per annum and specifically identifies it for promotion.
- 6.24 The SEP identifies that, across the County, the visitor economy accounts for 10% of all employment with Stafford Town having the County's second highest concentration in this sector after Staffordshire Moorlands (which hosts the Peak District and Alton Towers) with a sectoral growth rate twice the national rate.
- 6.25 There is a wide range of activities and attractions encompassed within the Visitor Economy. These have the potential to be grown and further strengthened by Stafford Borough's central location. Current activities and attractions are diverse and include:
- those linked to the quality of the natural environment, particularly visits and sporting activities centered on the Cannock Chase AONB;
  - heritage and day trip destinations including Shugborough Park and Estate, Trentham Estate and Gardens, Monkey Forest, Stafford Castle, Stafford Tudor Ancient High House;
  - the Staffordshire County Showground;
  - Stone canal town and the wider canal network and its associated marinas, facilities and activities;
  - dedicated business tourism facilities such as the Stafford Beacon International Centre, and the Yarnfield Park Training and Conference Centre;
  - day events including, for example, regular Farmers Markets and the annual Cheese and Ale Festival; and
  - hospitality services including a wide variety of hotels, restaurants etc.

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<sup>41</sup>

[https://www.enjoystaffordshire.com/dbimngs/Destination%20Staffordshire%20Strategy%20Action%20Plan%202015-18%20Published%20May%202015\(2\).pdf](https://www.enjoystaffordshire.com/dbimngs/Destination%20Staffordshire%20Strategy%20Action%20Plan%202015-18%20Published%20May%202015(2).pdf)

<sup>42</sup>

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Policy%20and%20Plans/Corporate%20Business%20Plan%202018-2021.pdf>

<sup>43</sup> <https://www.stokestaffslep.org.uk/app/uploads/2019/01/SSLEP-Strategic-Economic-Plan-April-2018-.pdf>

Question 6.L

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

- a) Do these policies continue to be sufficient in their current form or do they need adjustment?  
If so, how?
- b) Are there any visitor economy themes that should be more explicitly addressed? If so, which?

CONSULTATION

## 7. Delivering Town Centres that address Future Needs



OPTOMETRISTS  
**MGA**  
MALCOLM GRAY & ASSOCIATES  
OPTOMETRISTS & DISPENSING OPTICIANS  
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High Street Eccleshall

## Section 7 Delivering Town Centres that address Future Needs

- 7.1 The role of the Borough's town centres need to be protected and enhanced in order to support new and existing retail, commercial and service development, and facilitate future adaptation. This is important in order that their vitality and viability can support services as locally as possible in sustainable and well-connected locations. 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.
- 7.2 The National Planning Policy Framework requires Local Plans to define the retail hierarchy of centres<sup>44</sup>, promote a prosperous rural economy<sup>45</sup> and enable an appropriate mix of uses in town centres (including housing)<sup>46</sup> to reflect their distinctive character. In doing so the Local Plan should set out the role of each centre, and identify the town centre and primary retail boundaries to deliver new mixed-use development sites. Furthermore, the NPPF provides the opportunity for Local Plans to identify locally specific thresholds to assess development impacts on the vitality and viability of town centres<sup>47</sup>. A sequential test to planning applications for main town centre uses will be applied to proposals which are either not in an existing town centre or an up-to-date Local Plan. However, the test will not be used on small-scale rural development including offices.
- 7.3 To support the New Local Plan a detailed Town Centre Capacity Assessment (TCCA 2019)<sup>48</sup> has recently been completed for Stafford Borough. This study sets out the current performance of the three main centres across the Borough (Stafford, Stone, Eccleshall). The TCCA 2019 considers that this continues to be the appropriate retail hierarchy for Stafford Borough through the New Local Plan 2020-2040. Furthermore, the TCCA 2019 identifies that over the Plan period no further convenience retail floorspace is required due to existing commitments and increases in floorspace efficiency. Nevertheless 13,926 square metres of comparison floor space is required, with the focus at Stafford town centre to retain this market share and diversify the retail offer.

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<sup>44</sup> NPPF Para 85

<sup>45</sup> NPPF Para 83

<sup>46</sup> NPPF Para 85

<sup>47</sup> NPPF Para 89

<sup>48</sup> <https://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base>

## Question 7.A

- a) Do you consider that the hierarchy for Stafford Borough should consist of Stafford and Stone town centres with Eccleshall local centre?  
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?

7.4 In order to improve the three centres' TCCA 2019 proposed that:

- Stafford town centre would benefit from a stronger evening economy including restaurants. This is supported by the growth of future expenditure in food and beverage needs alongside cultural facilities. Local knowledge also suggests a demand for more long-stay parking to serve town centre businesses and visitors;
- Stone town centre could be improved by additional clothes retailers and florists alongside more mid-market and high-end retailers as well as further development of the evening economy;
- Eccleshall local centre would benefit from an increased mix of independent retailers and services. Additionally local knowledge indicates the need for additional parking to serve visitors to the town centre.

7.5 Considering the additional comparison retail needs and the hierarchy of centres being Stafford, Stone and Eccleshall the following recommendations are proposed to guide planning policies and proposals in the new Local Plan.

7.6 TCCA 2019 proposes that the majority of new comparison retail floorspace need (approx. 10,500m<sup>2</sup>) should be provided at **Stafford** town centre through the re-use of existing units or on new development sites. New mixed-use developments, including housing, could take place at Kingsmead Retail Park, Eastgate, the Shire Hall and in the Market Street area. This should be facilitated through a tightly drawn primary shopping area within the town centre boundary. Please refer to Map 7.1 for further details.

7.7 The TCCA 2019 considers that **Stone** has a compact, accessible and generally healthy town centre which should be maintained and recommends the encouragement of more café and restaurants alongside cultural and arts facilities. Other key findings of the Study in relation to Stone are:

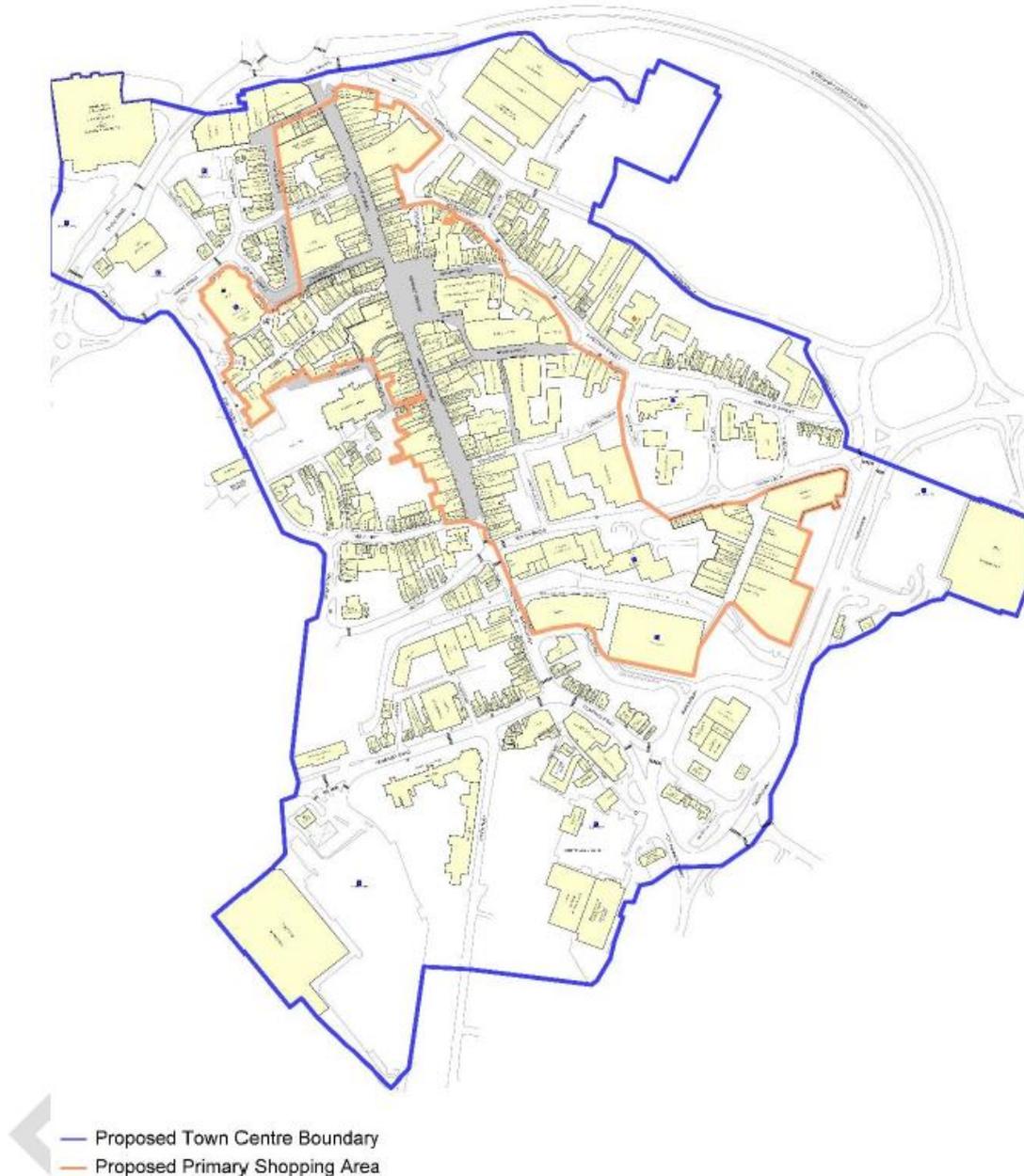
- although limited, development opportunities through the combining of vacant units to offer larger premises for modern, national retailers should be supported; and
- any larger scale proposals on the edge of the town centre may impact on car parking provision in the area.

Please refer to Map 7.2 for further details.

7.8 **Eccleshall** is considered by the TCCA 2019 to perform well as a local centre with a good range of uses and enjoys a low vacancy rate which should be maintained in the future to serve day-to-day needs of the local population whilst continuing to support independent operators. Please refer to Map 7.3 for further details.

Map 7.1

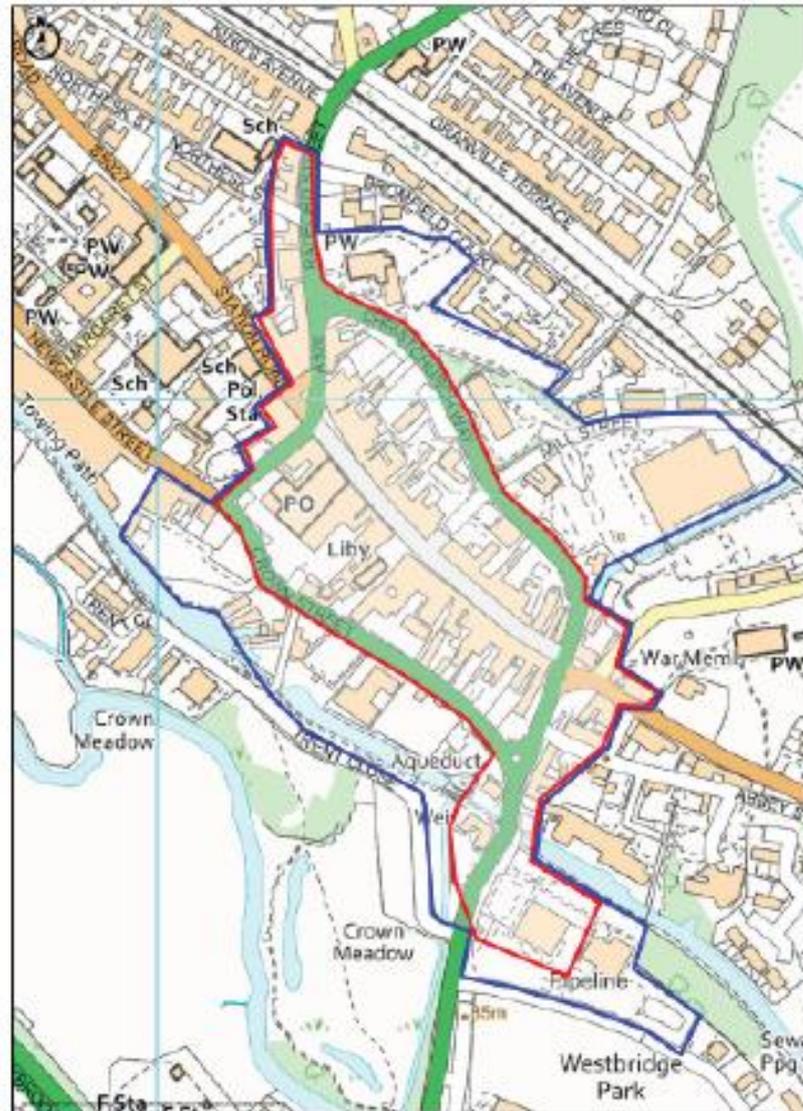
**Stafford Town Centre Proposed Boundaries**



Source : Stafford Borough Town Centre Capacity Assessment 2019

Map 7.2

Stone Town Centre Proposed Boundaries



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Key:

- Proposed Town Centre Boundary ————
- Proposed Primary Shopping Area ————

Source : Stafford Borough Town Centre Capacity Assessment 2019

Map 7.3

Eccleshall Local Centre Proposed Local Centre Boundary



Source : Stafford Borough Town Centre Capacity Assessment 2019

Question 7.B

- a) Do you consider that the future approach to the centre of Stafford, Stone and Eccleshall should be based on their respective distinctive characteristics?
- 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.

7.9 In order to set a local impact floorspace threshold, which differs from that identified in the NPPF ( 2,500m<sup>2</sup>) outside of the town centre boundaries, a number of factors need to be assessed. TCCA 2019 considers that it is inappropriate to apply the national threshold in the local context for Stafford, Stone and Eccleshall as smaller retail developments could have a significant

adverse impact on existing centres. Taking these local issues into account the TCCA 2019 proposes the following local impact floorspace thresholds:

- **Stafford town** - proposals for more than 1,000m<sup>2</sup> gross floorspace;
- **Stone town** - proposals for more than 500m<sup>2</sup> gross floorspace;
- **Eccleshall** - proposals for more than 300m<sup>2</sup> gross floorspace.

Question 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.

CONSULTATION

## 8. Delivering Housing



St Georges, Stafford

## Section 8 Delivering Housing

- 8.1 Providing a housing market which reflects the needs of all members of the community is a key objective of plan making. Ensuring the production of places which are desirable places in which to live, work and play necessitates the delivery of high-quality homes which meet the needs of everyone, and are delivered in the most sustainable locations.
- 8.2 The Government has set an objective of delivering 300,000 homes a year in the UK by the mid-2020s<sup>49</sup>. Therefore, the Borough of Stafford must prepare to deliver a level of growth which will aid in the realisation of this target.
- 8.3 This growth must be delivered in a manner which is conducive to a sustainable future. This notion is reinforced in the NPPF, which places a presumption in favour of sustainable development. The NPPF defines sustainable as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”<sup>50</sup>. Therefore, the new Local Plan must enable the provision of a housing stock which is delivered in a sustainable manner.
- 8.4 The NPPF mandates that sustainable development can be achieved by considering three main objectives. These are;
- An economic objective
  - A social objective
  - An environmental objective<sup>51</sup>.
- With this in mind, the new Local Plan will deliver housing in a manner which ensures economic prosperity, creates socially balanced communities and enhances the surrounding environment.

### Making Effective Use of Land

#### Making Preferential Use of Brownfield Land

- 8.5 Ensuring the effective use of land is an important consideration when releasing land for development in an area. Land is a finite resource, and thus to ensure that growth is conducive to a sustainable future, efforts should be made to ensure it is used as efficiently as possible.

<sup>49</sup> Government; <https://www.gov.uk/government/news/government-announces-new-housing-measures>

<sup>50</sup> Section 2, Paragraph 7;

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

<sup>51</sup> Section 2, Paragraph 8;

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

- 8.6 The NPPF recognises the importance of using land effectively, and states that planning policies should consider prioritising the use of brownfield land to meet the identified housing need of an area<sup>52</sup>. Further to this, efforts should be made to remediate degraded and derelict land where this would allow for its development.
- 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.

#### Question 8.A

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

### Housing Distribution and Density

- 8.8 Ensuring developments provide a density of units which works to optimise the use of land whilst protecting local character is an important consideration when delivering the housing stock of an area.
- 8.9 This is reinforced in the NPPF, which stipulates that plans should contain policies to optimise the use of land whilst meeting the identified need for housing in the area<sup>53</sup>. One way in which this can be achieved is through the enforcement of policies establishing housing densities.
- 8.10 When policies enforcing densities are adopted, consideration should be given to whether a range of housing densities reflective of the local character and existing townscape would be more appropriate than the use of a blanket housing density within an area.

<sup>52</sup> Section 11, Paragraph 117;

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

<sup>53</sup> Paragraph 122;

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

**Question 8.B**

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

If so do you consider:

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

Why do you think this?

- 8.11 The currently adopted Plan for Stafford Borough does not provide minimum density thresholds which must be adhered to when delivering development. If seen as desirable, a policy enforcing this could be introduced in the new Local Plan.
- 8.12 The NPPF suggests that densities should reflect the sustainability of transport available in an area<sup>54</sup>. For example, where development is situated around sustainable transport hubs, densities could be higher to encourage and support the use of these services. Within the Borough this would have greatest relevance for increased development density in close proximity to Stafford and Stone railway stations.

### Residential Space Standards

- 8.13 The Nationally Described Space Standards<sup>55</sup> seeks to enforce a minimum floor space on dwellings depending on the number of bedrooms and type of dwelling. To be enforced, these standards must be adopted through a LPA's Local Plan.
- 8.14 Ensuring the delivery of a minimum floor space could ensure the delivery of a higher quality housing stock, enhancing the living conditions of potential occupiers. Sub-standard living spaces and overcrowding can have a negative effect on the mental and social health of residents<sup>56, 57, 58</sup>. Therefore,

<sup>54</sup> Section 9, Paragraph 102;

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

<sup>55</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/524531/160519\\_Nationally\\_Described\\_Space\\_Standard\\_\\_\\_\\_Final\\_Web\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf)

<sup>56</sup> Space Standards the Benefits. UCL for CABE, 2010.

<https://webarchive.nationalarchives.gov.uk/20110118111541/http://www.cabe.org.uk/files/space-standards-the-benefits.pdf>

decreasing the provision of sub-standard living spaces could contribute to improving the health and wellbeing of local communities.

#### Question 8.D

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

- 8.15 The currently adopted Plan for Stafford Borough does not enforce the Nationally Described Space Standards (NDSS). Further it is worth noting that that introduction of the NDSS would need to be supported by evidence of need and the viability of this would need to be tested (PPG<sup>59</sup>).

#### Question 8.E

In the New Local Plan should the Council

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

Please explain your answer.

## Creating Mixed and Balanced Communities

### Housing Mix and Tenure

- 8.16 The creation of diverse communities necessitates the provision of a diverse housing stock. Specialist accommodation, affordable housing and a variety of house styles and sizes all contribute to the delivery of a housing stock which works for all.
- 8.17 The NPPF stipulates that the size, type and tenure of houses needed to accommodate the needs of different groups within the community should be assessed and reflected in planning policies<sup>60</sup>. This requires the performance of a Local Housing Needs Assessment, which will inform the necessary mix of

<sup>57</sup> UKGBC, Healthy housebuilding: Making 300,000 new homes a year better places to live [https://www.housinglin.org.uk/\\_assets/Resources/Housing/OtherOrganisation/Healthy-Housebuilding.pdf](https://www.housinglin.org.uk/_assets/Resources/Housing/OtherOrganisation/Healthy-Housebuilding.pdf)

<sup>58</sup> Mental Health is Everybody's Business, Staffordshire County Council and Stoke on Trent Mental Health Strategy – <https://www.staffordshire.gov.uk/Education/SpecialEducationalNeeds/Documents/Mental-Health-Strategy.pdf>

<sup>59</sup> <https://www.gov.uk/guidance/housing-optional-technical-standards#internal-space-standards>

<sup>60</sup> Section 5, Paragraph 61; [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

housing to ensure this is achieved. Planning Practice Guidance legislation details the processes necessary to achieve this.

- 8.18 Based on the most recent Economic & Housing Development Needs Assessment conducted by Stafford Borough, the following mix is suggested:

	1 bed	2 bed	3 bed	4+ bed
Estimated Future Need / Demand	17%	31%	42%	11%
Recommended Range	10-30%	25-40%	35-50%	5-20%

#### Question 8.F

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

#### Question 8.G

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

- 8.19 In some areas, there can be an imbalance in the housing mix between the urban and rural housing stocks of an area. For example, larger houses tend to dominate in rural areas. This can lead to an increase in under-occupancy where people who wish to downsize within the community they live are not able to due to a lack of smaller dwellings.

### Housing for those with Specialist Needs

- 8.20 Local residents with specialist needs may require the provision of specialist accommodation to meet their housing requirements. For example, elderly people and people with disabilities may require additional care, and thus facilities capable of providing this must be provided.
- 8.21 The population of older people within Stafford Borough is projected to increase by 34.7% in the next 20 years. This increasing population suggests an increased provision of specialist accommodation will be required. There are a variety of types of housing which can support the older residents of the Borough, for example; care homes and extra care facilities.
- 8.22 To meet the housing needs of Stafford Borough's older population, the new Local Plan must employ measures to increase the supply of care facilities.

This is reflected in the Economic & Housing Development Needs Assessment (EDHNA), which suggests that, when combined, there will be a need for an additional 1,111 care home spaces and extra care and sheltered housing units across the Borough.

- 8.23 Disabled people may also require specialist housing<sup>61</sup>. Similarly to elderly people, this may be in the form of residential care facilities or sheltered housing. However, in some instances adapted private housing may be the preferred or most appropriate option. The Planning Practice Guidance states that “Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling<sup>62</sup>”. Therefore, to comply with national policy, policies requiring housing to be wheelchair accessible can only be applied to affordable housing. The recent Economic and Housing Development Needs Assessment states that approximately 10% of local residents currently on the housing register to obtain an affordable home in Stafford Borough would require it to be wheelchair accessible. The currently adopted Plan for Stafford Borough makes no provision for housing to support wheelchair users.

#### Question 8.H

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

- 8.24 As previously mentioned, adapted private housing is sometimes sufficient in meeting the specialist needs of elderly and disabled people. Bungalows and other design features (e.g. door widths) are demonstrative of this, as they can provide a more suitable living space for residents with limited mobility whilst still being privately owned or rented by the tenant. Increasing the provision of bungalows throughout the Borough of Stafford may therefore help the Council to meet the housing needs of those with specialist requirements, whilst simultaneously reducing the pressure otherwise put on existing care facilities.
- 8.25 The currently adopted Plan for Stafford Borough makes no provision for the inclusion of bungalows within the delivered housing stock.

<sup>61</sup> A whole life Disability Strategy for Disabled People 2018-23, Staffordshire County Council <https://www.staffordshire.gov.uk/Care-for-all-ages/Whole-life-disability-strategy/Whole-Life-Disability-Strategy-2018-2023-FINAL.pdf>

<sup>62</sup> <https://www.gov.uk/guidance/housing-optional-technical-standards#accessibility-and-wheelchair-housing-standards>

**Question 8.I**

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

**Students**

8.26 The recent acquisition of the former Staffordshire University Stafford campus by the New Beacon Group suggests that student presence within the Borough will increase. However, the existing halls of residence previously used by Staffordshire University students remain vacant, and are capable of supporting the forecasted student body. This is supported in the recent Economic and Housing Development Needs Assessment. Therefore, the Council does not consider it necessary to make any additional provision for student accommodation in the Borough of Stafford.

**Question 8.J**

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

**Affordable Housing**

8.27 The delivery of affordable housing allows local residents who cannot afford the standard market rate the opportunity to rent or purchase their own home.

8.28 The NPPF stipulates that on housing developments of 10 dwellings or more, at least 10% of the units are offered for affordable home ownership<sup>63</sup>. However, the council can require the provision of levels in excess of this, provided there is a demonstrable need for such accommodation within a locality.

8.29 The findings of the most recent Economic & Housing Development Needs Assessment indicates that to satisfy the demand for affordable housing need within the Borough of Stafford, between 252 and 389 affordable units must be delivered a year. The exact figure will be dependent on the level of growth eventually decided upon by the Council, and so cannot be confirmed at

<sup>63</sup> Section 5, Paragraph 64;

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

present. Currently, the affordable housing figure in the Borough is 210 units per annum and the Borough has provided an average of 193 affordable homes per year during the current Plan Period to date (2013/14 to 2018/19). If the figures described within the Economic and Housing Development Needs Assessment (EHDNA) were adhered to, it would require a significant increase in affordable housing delivery.

- 8.30 The NPPF also suggests that policies requiring developers to deliver affordable homes on sites that are 5 units or less in designated rural areas<sup>64</sup> can be adopted. This would diversify the distribution of affordable homes throughout the borough.

#### Question 8.L

Should the council require affordable units to be delivered on sites with a capacity of less than 5 units in designated rural areas?

- 8.31 There are a number of existing Planning Permissions in the Borough that are identified as Rural Exception Sites but where development has not yet commenced. Upon expiration of the current Planning Permission (should development have not been commenced) there is the risk that such sites might in the future become available to market housing and therefore be lost to rural affordable housing.

#### Question 8.M

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

<sup>64</sup> National Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985.

## Gypsies, Travellers and Travelling Showpeople

8.32 The Planning Policy for Traveller Sites document stipulates that local planning authorities should make their own assessment of need for gypsy and traveller pitches, and ensure that a 5 year supply of pitches is available<sup>65</sup>. The Borough Council is in the process of conducting a new Gypsy and Traveller Accommodation Assessment with the necessary summer and winter month residency surveys. The results of this study will be available to inform a subsequent consultation.

## 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<sup>66</sup>.

8.34 At present there are 42 individuals whom have expressed interest in building a self-build home within the Borough of Stafford, and as such are included on the self-build register for the area.

8.35 Self build homes have the potential to raise design standards and diversify the housing stock of an area. In the current Local Plan, no provisions are made to increase self-build opportunities within the borough. The new Local Plan provides an opportunity to amend this.

### 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?

8.36 Settlements with a dwelling count of less than 50 units are not included within the proposed settlement hierarchy, and as such will not be allocated a growth level in accordance with the development strategy. However, this can result in the stagnation of communities, and can force residents to move away from their communities when their housing needs change if no suitable accommodation exists in the vicinity.

<sup>65</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457420/Final\\_planning\\_and\\_travellers\\_policy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf)

<sup>66</sup> <http://www.legislation.gov.uk/ukpga/2015/17/contents/enacted/data.htm>

- 8.37 To prevent the stagnation of communities, and to allow for the organic and sustainable growth of smaller settlements, it is considered that it might be beneficial to allow self-build only developments as infill within settlements of less than 50 dwellings. To prevent the loss of character as a result of such development, growth levels in such settlements would be capped at 10% (i.e. a maximum of 5 dwellings) of the current settlement size.

Question 8.O

- a) Do you consider that the approach detailed above will be beneficial to the smaller settlements of the Borough of Stafford and their residents?
- b) Do you think it would be beneficial to only allow people the ability to build their own homes in smaller settlements if they have a demonstrable connection to the locality of the proposed development site?

## 9. Delivering Quality Development



Trentham Gardens

## Section 9 Delivering Quality Development

9.1 This Section considers a wide range of factors that intimately inter-twine in determining the overall quality of the environment in which we live and work, and in which the new Local Plan 2020-2040 will operate. The scope of this section includes the following topics:

- Green and Blue Infrastructure
- The Natural Environment;
- Productive Landscapes;
- Landscape Character;
- The Historic Environment;
- Design;
- Local Green Space;
- Play areas and open space; and
- Sports facilities.

### Green and Blue Infrastructure

9.2 The quality of the environment is an essential component in providing a quality of place for living and working. The NPPF acknowledges the strategic role Green Infrastructure has in terms of setting out the overall strategy for development<sup>67</sup>.

9.3 Green and Blue Infrastructure (GBI) is a holistic approach to viewing the natural and historic environment, acknowledging the multiple benefits and vital functions it provides for the economy, wildlife and health and well-being of communities and individuals.

9.4 GBI delivers “ecosystems” services which are the varied benefits that humans freely gain from the natural environment, including goods and services and some of which can be valued economically. Ecosystem services include:

- Provisioning services (products from land and water);
- Regulating services (processes such as pollination, water purification and climate regulation);
- Cultural services (heritage, recreation, health and well-being);
- Supporting services (essential functions such as soil formation and nutrient cycling).

9.5 Some examples of GBI are

- Parks and gardens;

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<sup>67</sup> NPPF Para 20.

- Green corridors such as road, rail and water course corridors;
  - Natural and semi-natural green spaces such as nature reserves, grassland, heathland;
  - Amenity greenspace such as play areas, community gardens, playing fields and cemeteries;
  - Blue environment such as canals, rivers, lakes and sustainable drainage systems.
- 9.6 Planning for green infrastructure is embedded in National Policy. This means that consideration needs to be given to green-blue infrastructure in the same way that it has to be given to other forms of infrastructure (e.g. transport, social infrastructure). It is recognized that the quality of the environment is an essential component in providing a quality of place for living, working and relaxing. Therefore, the Council is seeking to enhance, protect and expand Green and Blue Infrastructure within the Borough.
- 9.7 The majority of the Borough's population are located in Stafford and Stone. Within these two towns there is a central swathe of Green Infrastructure which can be seen as "green lungs" in the most developed part of the Borough.
- 9.8 The current adopted Plan for Stafford Borough has a combined policy for the Natural Environment and Green Infrastructure. The New Local Plan provides and opportunity to reconsider this approach.

#### Question 9.A

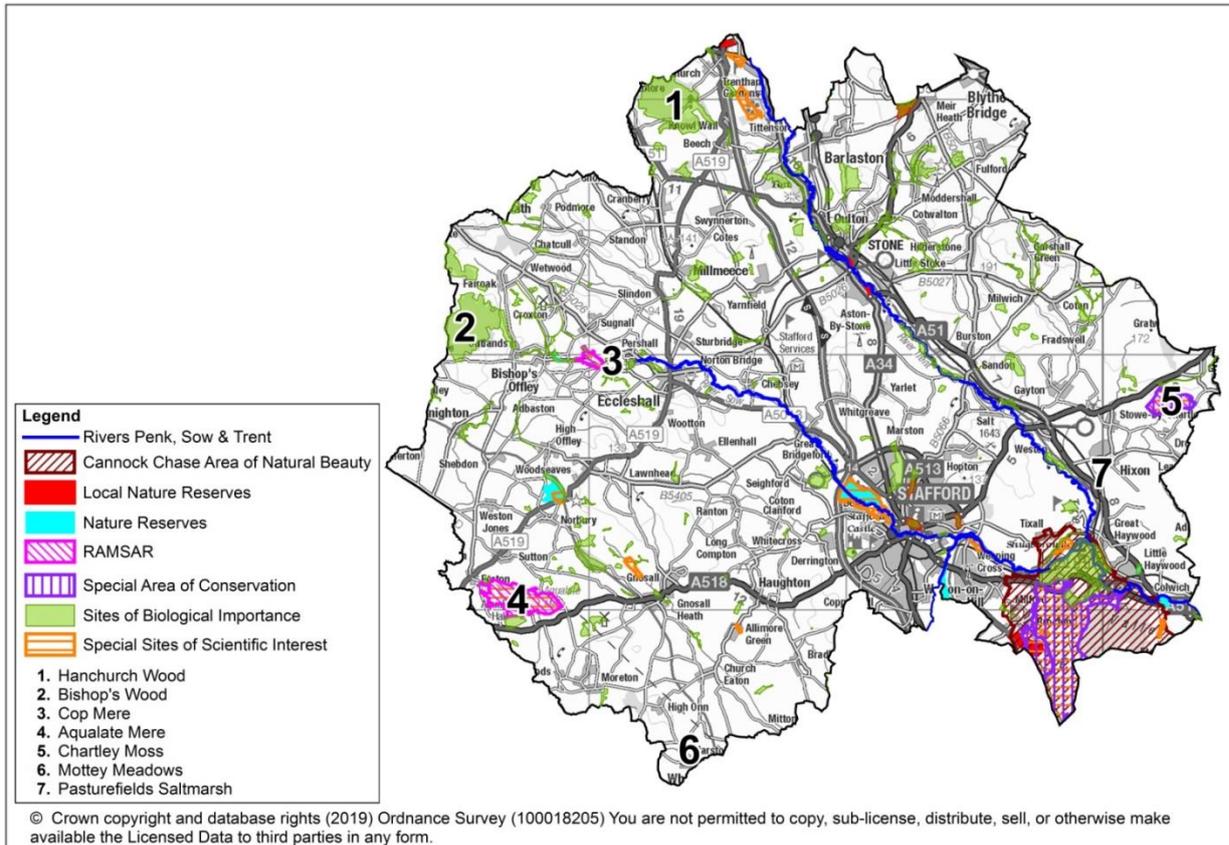
#### Should the Council

- 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?

### Natural Environment

- 9.9 Biodiversity is defined as the variety of life-forms and the role that they play. This includes the whole range of mammals, birds, reptiles, amphibians, fish, plants, invertebrates, plants, fungi and micro-organisms. It also includes both common and rare species, as well as genetic diversity within species.
- 9.10 Across the Borough, reflecting its diversity of habitats, is a range of key species including Otter, Barn Owl, Great Crested Newt, Small Pearl-Bordered Fritillary, farmland birds, reptiles and bats.

Map 9.1 Stafford Borough Council Natural Assets



9.11 Stafford Borough is a mainly rural area with a wide range of habitats that include many sites of local and national importance. This complex set of natural assets, which are found across the borough, is summarised below and is shown in Map 9.1. Further details are provided by the Stafford Borough Nature Recovery Network report<sup>68</sup>:

- Three rivers, the Penk, Sow and Trent converge to the west of Stafford town;
- In the northwest of the Borough are the woodlands of Hanchurch and Bishop's Wood;
- To the southeast is the heathland of Cannock Chase which is nationally designated an Area of Outstanding Natural Beauty (AONB);
- In the west of the Borough, as part of the Meres and Mosses landscape, there are a variety of wetlands (e.g. Cop Mere, Loynton Moss and Aqualate Mere).
- To the east of Stafford town is Chartley Moss (Britain's largest example of a Floating Bog).

<sup>68</sup> <https://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base>

- On the southern border of the Borough is Motte Meadows, one of the best-preserved floodplain meadows in the country.
- In total there are 15 nationally designated Sites of Special Scientific Interest (SSSI), two of which are National Nature Reserves;
- There are many locally designated Sites of Biological Importance (SBI) that are of county significance for their habitats and wildlife.
- Stafford Borough Council also own and manage seven Local Nature Reserves across the Borough.

9.12 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 Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)<sup>69</sup>. Guidance<sup>70</sup> also extends the protection to “Ramsar sites” of international importance for wetland habitats. The sites are currently covered under Local Plan Policy N5. Within Stafford Borough the international designations are:

- Special Areas of Conservation:
  - Cannock Chase,
  - Pasturefields Saltmarsh,
  - Motte Meadows; and
  - Chartley Moss.
- Ramsar Sites
  - Chartley Moss
  - Cop Mere
  - Aqualate Mere.

Some specific aspects of environmental quality, particularly in respect of air quality, are considered by Section 10 of this document.

9.13 Ensuring that the environmental quality of Stafford Borough is maintained and, where possible, enhanced is a key issue to be addressed by the Local Plan, as well as protecting key environmental assets. Authorities should promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, and identify suitable indicators for monitoring biodiversity in the Plan.

9.14 The protection and enhancement of biodiversity and open spaces should be seen as integral to sustainable development, through the development of an overall 'Green Infrastructure' network of green and blue spaces, landscapes and natural elements that intersperse and connect settlements and surrounding areas. All new development will seek to adopt this approach and is currently addressed through Local Plan Policy N4.

<sup>69</sup> <https://sac.jncc.gov.uk/>

<sup>70</sup> <https://jncc.gov.uk/our-work/ramsar-convention/>

- 9.15 The previous Government's Environmental Bill achieved Committee stage after its second reading in Parliament. At the time of the preparation of this consultation document it was unknown whether the Bill would be retained by the new Government. However, should the Bill be retained, it will emphasise the above issues and also introduce new duties for Local Planning Authorities. The Bill may make biodiversity net gain mandatory for new developments, ensuring that natural green space is enhanced and increased.
- 9.16 The Environment Bill also introduces provisions requiring the development of Local Nature Recovery Networks across England, which will help support better spatial planning for nature recovery by setting out priorities and opportunities. The Stafford Borough Nature Recovery Network report includes a map of existing nature assets such as protected sites and habitats identifying key opportunities for enhancement to meet national policy requirements.

#### 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

#### Question 9.D

How should plan policies have regard to the new AONB Management Plan and

- 9.17 The Cannock Chase AONB is one of 47 designated AONBs in the UK. It was designated as an AONB in 1958, and is considered to be one of the most vulnerable, due to its proximity to large adjoining conurbations and the rich array of mineral resources located under it. A substantial part of the heathlands in the AONB have been designated as a Special Area of Conservation (SAC), as a measure of their importance. The SAC is currently covered by Policy N6 and the AONB by Policy N7 of the Adopted Plan for Stafford Borough 2011-31.

## Trees

- 9.18 Trees are incredibly valuable components of both the urban and rural landscapes of an area, and provide wide reaching and multifunctional benefits for human and wildlife populations alike. Their widespread distribution can predispose them to being removed or damaged as a result of the development of an area. The prevention of this activity therefore requires careful consideration to ensure development remains to be sustainable.
- 9.19 Plan-making provides a mechanism by which to increase the protection offered to trees, ensuring their future is safeguarded. However, the tree stock of an area is a dynamic and constantly evolving entity, and so it is not sufficient to just protect existing trees. Efforts should be made wherever possible to replenish and increase the tree cover of an area. This is a notion which is acknowledged within the NPPF. Here it is stated that planning policies should enhance the natural and local environment, and should recognise the benefits provided by trees and woodland.

### The Importance of Tree Stock

- 9.20 Trees can be found in almost all of the terrestrial ecosystems across the Borough of Stafford. In rural areas, woodland, orchards hedgerows and mature trees provide habitats for a plethora of species, ensuring the survival of local wildlife. Similarly, embedding trees throughout the built vernacular provides a space for urban wildlife, ensuring that biodiversity levels in urban environments are somewhat maintained. By protecting trees, local wildlife is protected in tandem.
- 9.21 Whilst trees must be considered as valuable natural assets in their own right, it is only when considering the positive impacts they have upon the human populous can a full appreciation of their importance be achieved. Trees increase the visual amenity of residential and industrial areas, ensuring the environmental quality of an area is enhanced.
- 9.22 Ensuring a plentiful and widely distributed level of tree cover helps to mitigate the effects of a changing climate. The UK Parliament has recently declared a “Climate Emergency”, emphasising the need to increase efforts to create a greener and more environmentally friendly future. There are a number of issues associated with climate change that tree planting provides a solution to. For example, trees remove carbon from the earth’s atmosphere, increasing air quality and reducing greenhouse gas levels. Furthermore, when planted in urban environments, trees increase urban cooling, preventing the formation of urban heat islands.

9.23 In short, the importance of protecting and increasing tree cover must not be underestimated.

### **Protecting and Enhancing Tree Cover**

9.24 The currently adopted Plan for Stafford Borough does not provide a specific policy to maintain and enhance tree cover in the area. However, the Council recognises the benefits that achieving this will provide. As such, 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.

9.25 The Council is considering a multi-faceted approach to aid in the realisation of this objective by:

- a) ensuring that the existing tree stock within the Borough will be offered adequate protection from removal or damage.
- b) ensuring that any development which provides an opportunity to increase tree cover on site will do so.
- c) developing and later adopting a tree strategy which will see any and all development contribute to a scheme which will increase the tree cover across the Borough as a whole.

#### **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?

### **Productive Landscapes**

9.26 No part of the economy is more important than food. Food is vital for life and for many it is the source of our livelihoods.

9.27 However the way we produce, distribute, market and consume food is raising a series of difficult questions and issues. Globally we are the first generation more likely to die as a result of lifestyle choices than infectious diseases. Obesity is a particular issue for poorer communities and young people.

9.28 Intensive farming generates a number of environmental problems, including impacts on soil health, air quality, river freshness, biodiversity and climate change. To address these growing problems and to ensure food supply we need to be an active member of the food revolution.

**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.

**Landscape Character**

- 9.30 The distinctive character and quality of our settlements is directly informed and influenced by its landscape setting (which is itself often of a high quality), and new development (particularly at the edges of our settlements), can often have a negative impact on that setting.
- 9.31 Natural England provide guidance for the preparation of a Landscape Character Assessment<sup>71</sup> and Sensitivity Assessment<sup>72</sup>. This approach has the benefit of considering the whole of an area's landscape (rather than focusing on particular locations) and understanding the potential impact of development.
- 9.32 Staffordshire County Council has developed a Landscape Character Assessment process, which assesses the landscape and identifies specific Character Areas. It places the Borough into 3 Character Areas:
- 61 / 62 Shropshire, Staffordshire & Cheshire Plan / Cheshire Sandstone Ridge
  - 67 Cannock Chase & Cank Wood
  - 68 Needwood & South Derbyshire Claylands
- New development needs to consider the qualities of the specific Character Area it takes place within.

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<sup>71</sup> Natural England, 2014

<sup>72</sup> Natural England, 2019

**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?

**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.

**Historic Environment**

- 9.33 Stafford Borough is a predominantly rural district in which the landscape has been continuously shaped by human activity over thousands of years. In consequence the Borough contains a wide diversity of historic landscape types providing a setting for a wide and important range of historic structures. These include the major urban settlements of Stafford and Stone, and a large number of smaller villages all with distinct morphologies and groupings of historic buildings. The prevailing rural landscape is of enclosure and post enclosure hedged field layouts of the 18<sup>th</sup> and 19<sup>th</sup> centuries. Within this prevailing landscape form exist a variety of additional landscape forms including:
- unenclosed grazing land (e.g. Cannock Chase, the common at Rough Close);
  - numerous historic parks and designed landscapes;
  - landscapes affected by industry such as bone and flint grinding in the Moddershall Valley or by glass making as at Bishops Wood;
  - those created by transport such the canal, railway and turnpike road networks.
- 9.34 Within, and often overlain by these predominantly post medieval features, is evidence of older activity dating back to pre-historic times including burial sites and mounds, hill forts and encampments and the alignment of Roman or older roads. For the most part the historic environment is intertwined with the natural – an historic hedgerow or water meadow can be a key part of biodiversity, as well as contributing to the attractiveness or natural beauty of the Borough's scenery. The historic environment is therefore part of a continuum which provides a setting and framework both for current activities and future development and which needs to be viewed with this holistic perspective.
- 9.35 Within this broader context 908 heritage assets in Stafford Borough have, in 2019, been specifically designated as meriting statutory protection for their

significance from an international, national or local perspective. These include:

- 830 listed buildings,
- 4 registered historic parks and gardens,
- 1 registered battlefield,
- 30 designated conservation areas
- 43 scheduled ancient monuments.

- 9.36 The Staffordshire Historic Environment Record additionally includes 2,861 non-designated heritage assets or sites of which 44 are historic parks and gardens, a large number are sites of industrial archaeological interest or activity, and many relate to topographical features such as abandoned field systems or other earthworks. There are a further, unknown, number of individual older buildings which have not been systematically surveyed but which contribute to the distinctive architectural character of the Borough and which may merit formal recognition.
- 9.37 As well as its contribution to the physical character and appearance of the Borough the historic environment plays a key role in the local economy, in supporting the healthy living and cultural offers. Historic buildings make desirable homes and are attractive as business premises, offering distinctive accommodation and higher rentals per square foot than modern office developments. Redundant older buildings offer highly adaptable space for conversion to alternative uses. Historic town and village centres, historic parks and canals all attract tourism and support the visitor economy. The historic environment in its widest sense including public parks is part of residents' familiar and settled surroundings, and can support initiatives to promote healthy living and well-being. The historic environment is also part of an inherited communal culture: more significant listed buildings and designed landscapes are part of national or international culture and have an educational and recreational value.
- 9.38 Many of the pressures affecting the historic environment across the Borough are similar and sometimes identical to those experienced by the natural heritage. These include intensification of agriculture, hedgerow and hedge-bank removal, effects of climate change including riverbank erosion and increased risk of flooding plus pressure of new development including infrastructure and telecommunications encroaching on to previously undeveloped sites. The historic environment is additionally subject to specific pressures from:
- neglect of historic buildings and sites;
  - malicious or unauthorised intervention in historic sites;
  - proposals for insensitive or poorly understood change to historic fabric or urban morphology;

- unsympathetic designs or poorly sited or disproportionately scaled new development in or adjacent to historic places including development which interrupts historic views; and
- the conflicting demands of non-heritage legislation and standards;
- the changing pattern of retail and usage of town centres is placing additional stress on historic towns.

### Question 9.1

Should the new local plan:

1. Adopt a broad definition of historic environment encompassing a landscape scale and identification with natural heritage rather than the current protection of designated heritage assets approach?
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.

### Design

- 9.39 “The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work, and helps make developments acceptable to communities”. This is part of the opening paragraph of section 12 of the NPPF and clearly demonstrates the Government’s acknowledgment that achieving High Quality Design is a fundamental aspect of sustainable development and must be a key consideration in the plan and decision-making process.
- 9.40 Ensuring high quality urban, architectural and landscape design and the conservation of the historic and natural environment are therefore crucial elements in creating positive and inspiring places for people to live, work and enjoy. High quality design can make the difference between a successful development and a mediocre or unsuccessful one. Therefore development at any scale and location should make a positive contribution to providing better places. The overall attractiveness and quality of places within the built and natural environment also plays an important role in attracting and retaining

people and investment into an area. In the Borough these matters are currently informed by two Supplementary Planning Documents on “Design”<sup>73</sup> and “Shop Fronts and Advertisements”<sup>74</sup>.

**Question 9.J**

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

Please explain your rationale

**Question 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

- 9.41 Stafford Borough encompasses a wide variety of attractive settlements whose scale and character varies between large urbanised County towns and smaller rural market towns, villages and hamlets. Many of these settlements have high quality landscape settings that directly inform their distinctive characters and which contain important heritage assets, open spaces and townscapes that are of high quality and which make a definitive contribution to the overall quality of life within these places.
- 9.42 The NPPF states in Paragraph 129 that Local Planning Authorities “should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development”. This begs the question as to whether there are sufficient tools and processes within the current Local Plan and Planning Service to support the delivery of good design. Similarly, there is the question of whether or not the quality and consistency of planning decisions be helped and improved through the utilisation of external expert design advice and in the adoption of nationally prescribed design standards or through the development of Characterisation based Design Guidance.

<sup>73</sup>

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Forward%20Planning/Adopted%20SPD%20on%20Design%20April%202018.pdf>

<sup>74</sup>

<https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Forward%20Planning/Shopfronts%20and%20Advertisements%20SPD%20Adopted%20April%202018.pdf>

### Question 9.L

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

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

### Local Green Space

- 9.43 Ensuring the provision of an accessible and extensive network of green space is an important consideration when planning for the development of an area. Green space provides many benefits for both human and wildlife populations alike. For example, they can provide local communities with areas for recreation, act as oases of tranquility or provide habitats for local wildlife. As such, areas of green space can bear significant levels of local importance and be considered as valuable community assets.
- 9.44 In 2012, the National Planning Policy Framework (NPPF) introduced the policy designation of Local Green Space (LGS)<sup>75</sup>. When designated as LGS, the site in question is afforded the same protection from development as Green Belt, and thus is preserved for the enjoyment of local communities.
- 9.45 The Council recognises the importance of maintaining and, where possible, enhancing the network of green spaces throughout the Borough of Stafford. The new Local Plan provides an avenue through which to achieve this. Therefore, the Council will seek to designate sites identified as being locally important as Local Green Space through the new Local Plan process.

### Policy Background

- 9.46 The designation of LGS must be done in accordance with the relevant policy guidelines. These can be found in the NPPF and the relevant PPG. The NPPF stipulates that to be considered suitable for LGS designation, sites must be

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<sup>75</sup> NPPF Para 11

demonstrably special to the local community, within a reasonable proximity to the community it serves, and must not be an extensive tract of land<sup>76</sup>.

- 9.47 Further criteria that must be adhered to when designating LGS can be found in the relevant PPG. This provides additional technical guidance as to what attributes a site must, or must not, possess to be considered appropriate for LGS designation<sup>77</sup>.

#### Question 9M

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

### Play Areas and Open Space

- 9.50 NPPF states that the planning system has an important role in facilitating social interaction and creating healthy, inclusive communities<sup>78</sup>. Sites designated as open space and play space are protected from development, subject to some limited exceptions. This ensures that new development does not impinge on the positive benefits of the existing designated spaces.
- 9.51 Within the Borough there are a variety of parks and open spaces where a range of diverse activities can take place. The formal splendor of the town parks is complimented by many visitors and residents, and is complemented by the many informal open space areas to be found around the Borough. Within the Borough there are currently:
- 4 Destination Parks;
  - 7 District Parks;
  - Over 70 local play areas;
  - 37 grass pitches;
  - 1,000 acres of open spaces maintained by the Council;
  - 20 allotment sites.
- 9.52 There is guidance available on how much space should be available to the public and how far away any open space should be. Play England provide thresholds for what type of spaces should be available for play within walking distances of a house:
- Doorstep play – within 100 metres;
  - Local play within 400 metres;

<sup>76</sup> Paragraphs 99-101;

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

<sup>77</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

<sup>78</sup> NPPF Para 92

- Neighbourhood play – within 1,000 metres.

9.53 Similarly, Natural England have developed the Accessible Natural Greenspace Standard (ANGSt) as follows:

- 2 hectares of open space no more than 300 metres away;
- 20 hectares of open space no more than 2km away;
- 1 accessible 100 hectare site no more than 5km away;
- 1 accessible 500 hectare site no more than 10km away.

This equates to 20m<sup>2</sup> open space per person. The Fields in Trust have calculated that 2.4 hectares are required per 1,000 persons, provided in the following way:

- 1.6 hectares of outdoor sport;
- 1.2 hectares of which to be provided as playing pitches;
- 0.8 hectares to be provided as children's play space.

#### Question 9.N

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

### Sports facilities

9.54 The Council commissioned Knight Kavanagh and Page to assess the current and future demand for playing pitches and sporting facilities across the Borough<sup>79</sup>. This assessment includes both indoor and outdoor facilities. Based

<sup>79</sup> <https://www.staffordbc.gov.uk/node/315144>

on the work undertaken it has been identified that there is currently a Borough-wide shortfall of:

- Water space equating to two x 4-lane twenty five metre pools;
- A shortage of four full-sized 3-G artificial pitches;
- A senior artificial cricket pitch;
- One Sports Hall.

9.55 When future population growth is considered the implied Borough-wide additional need to that listed above is:

- an additional swimming pool;
- 8 grass pitches. Of which:
  - 3 x 11vs11 pitches;
  - 1 x 9vs9 youth pitch;
  - 4x 5vs5 mini pitches.

Whether or not this implied additional need is addressed is ultimately a policy decision which will need to take account of financial and other implications.

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?

# 10. Environmental Quality



Staffordshire Place, Stafford

## Section 10 Environmental Quality

- 10.1 Environmental quality is an important consideration in the plan making process. Ensuring high quality increases the amenity of an area, and can have a positive effect on the health and wellbeing of local residents.
- 10.2 Air quality, excessive noise and light pollution and the management of waste can all contribute to the environmental quality level of an area. As such efforts should be made to ensure such factors are properly considered and adequately mitigated for when developments are proposed.
- 10.3 The Local Plan provides an avenue which can be used to maintain desirable levels of environmental quality in an area. As such, the council will seek to ensure that appropriate measures are adopted to achieve this in the new Local Plan.

### Air Quality

- 10.4 Increasing air quality is now an internationally acknowledged issue. Poor air quality can have damaging effects on the health of both human and wildlife populations, and can exacerbate the processes which lead to climate change.
- 10.5 Air quality is compromised when air pollutants are released into the environment. Generally speaking, said pollutants are released into the atmosphere when fossil fuels are burned. Therefore, air quality is lower in industrial areas, transport corridors and densely populated residential areas.
- 10.6 Reducing air pollution, and thus increasing air quality, requires the enforcement of a variety of measures which help to mitigate the release of airborne pollutants. When this is achieved, it is anticipated that current air quality levels will stabilise, and in the future, will increase.
- 10.7 There are a number of legislative documents which aim to increase air quality in the UK. For example, the 2008 Ambient Air Quality Directive<sup>80</sup> sets legally binding limits of air pollution which must not be exceeded, whilst the government's 25 Year Environment Plan<sup>81</sup> sets the target of significantly

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<sup>80</sup> 2008 Ambient Air Quality Directive, Article 32; <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1486474738782&uri=CELEX:02008L0050-20150918>

<sup>81</sup> 25 Year Environment Plan, Page 97;

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/693158/25-year-environment-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf)

reducing air pollution caused by the 5 main pollutants by 2030. The NPPF<sup>82</sup> acknowledges the importance of planning policies contributing to achieving these objectives within the UK. Therefore the new Local Plan will embed measures to achieve this within Stafford Borough.

- 10.8 Current air quality levels in Stafford Borough are demonstrative of an improvement when compared with historic levels. However, it is important to ensure that the forecasted levels of growth and correlative increase in human population within the borough do not adversely affect air quality.



- 10.9 Stafford Borough provides the setting for four internationally designated Special Areas of Conservation (SACs) and three RAMSARs . These can be found at Cannock Chase, Pasturefields Saltmarsh, Motte Meadows, Chartley Moss, Cop Mere and Aqualate Mere. These sites have all been designated due to the on-site presence of habitats or species which warrant special protection from detrimental human activity.



- 10.10 One of the five main air pollutants are gases belonging to the group of Nitrogen Oxides (NO<sub>2</sub>). When excess NO<sub>2</sub> particles are released into the atmosphere, they can disrupt and destabilise the nutrient processes of an area. Ultimately, this can change the conditions of an area, preventing the survival of existing ecosystems. As such, it is important to ensure NO<sub>2</sub> levels

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<sup>82</sup> NPPF, Paragraph 181;

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

are kept to a minimum where they could adversely impact biodiversity assets of international importance.

## Waste and Recycling

- 10.11 The refreshed Staffordshire and Stoke-on-Trent Joint Municipal Waste Management Strategy<sup>83</sup> was adopted in 2013 and provides the strategic approach to the handling of waste in Staffordshire including Stafford Borough.
- 10.12 In Stafford Borough the projected increase in population size suggests that there is likely to be a corresponding increase in household waste. This will increase the pressure placed on existing waste and recycling infrastructure within the Borough, which may result in some facilities reaching maximum capacity. Therefore, the Local Plan must ensure sufficient measures are implemented to avoid this.
- 10.13 Traditionally, waste was disposed of in landfill sites alone. The disposal of household waste at landfill can have negative impacts on the environment. As pressure on landfills increase, further land has to be sought to increase capacity, whilst greenhouse gases which are released from landfill facilities accelerate the processes causing climate change. These effects can be minimised by increasing the usage of sustainable waste disposal methods such as recycling, composting or using waste for energy production.
- 10.14 The NPPF<sup>84</sup> places a focus on Local Plans incorporating measures to minimise waste and the subsequent pollution. To achieve this, plans must make provision for the supply of sufficient infrastructure which encourages sustainable waste disposal. This notion is further reiterated in the relevant Planning Practice Guidance<sup>85</sup>.
- 10.15 The sustainable disposal of waste has decreased in Stafford Borough in recent years. In 2018, the recycling rate for all waste produced in Stafford borough was 52.02%, whilst the same figure in 2015 was 55%. This is demonstrative of the need to take further action to encourage and facilitate sustainable waste disposal in Stafford Borough.

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<sup>83</sup> <https://www.staffordshire.gov.uk/Waste-and-recycling/wastestrategy/JointMunicipalWasteManagementStrategy.aspx>

<sup>84</sup> NPPF, Paragraph 8c;

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

<sup>85</sup> Planning Practice Guidance; <https://www.gov.uk/guidance/air-quality--3>

Question 10.C

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

Therefore, should the council;

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

CONSULTATION

# 11. Health and Wellbeing



Church Lane, Stafford

## Section 11 Health and Wellbeing

- 11.1 Most developments have the potential to positively influence health and wellbeing. The National Planning Policy Framework promotes healthy and safe communities by stating that policies and decisions should aim to achieve healthy, inclusive, and safe places. They have said new developments should; promote social interaction, be safe and accessible, and enable and support healthy lifestyles<sup>86</sup>.
- 11.2 Stafford Borough faces a number of key health and wellbeing challenges associated with a rural and ageing population, along with avoidable behaviors such as physical inactivity, poor diet, and excessive alcohol consumption.
- 11.3 Stafford is a relatively affluent area. However inequalities exist within the Borough. There are seven wards which are classed as deprived, and some of the remote rural areas have issues with hidden deprivation and in particular around geographical access to services. This means that the people living in these wards do not have the same life chances, and are more likely to experience chronic ill health than people living in other wards. This leads to differences in healthy life expectancy, and overall, the life expectancy difference in Stafford Borough is 6 years. Between the most and least deprived wards there are differences of 9 years for men, and 14 years for women.
- 11.4 It is well documented that inequalities in health and wellbeing are influenced by social, economic and environmental factors. These are known as the “wider or social’ determinants of health”. In order to address these, it is essential that community needs are supported through appropriate physical social and green infrastructure, and by other facilities and key services which contribute to improving physical and mental health and wellbeing, and the overall quality of life experienced by residents.
- 11.5 We are living in a time of unprecedented and growing demand for health and care services which is largely fueled by the increasing age of our population and modern lifestyles. A King’s Fund report (2018)<sup>87</sup> highlighted the stalling of improvements in national life expectancy for the first time in 150 years. Their analysis shows this to be driven by health inequalities arising from the social determinants of health with the effects being felt by most, not just the worst off in society.

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<sup>86</sup> Section 8. Promoting healthy and safe communities Paragraphs 91 to 101  
<https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-and-safe-communities>

<sup>87</sup> <https://www.kingsfund.org.uk/publications/vision-population-health>

- 11.6 The Staffordshire Health and Wellbeing Strategy (2018-2023)<sup>88</sup> states that communities must be enabled to take more control of their own health and lifestyle choices, and that public sector services have a duty to support this by creating a healthy environment that helps people to live more healthily.
- 11.7 The NHS Long Term Plan (2019)<sup>89</sup> outlines a need to reduce growth in demand through better integration and prevention. The plan places great emphasis on the role of social determinants in health planning and outlines new requirement for local health systems to set out how they will reduce health inequalities.
- 11.8 Health and Wellbeing cuts across many policies which are included in the adopted Local Plan and resources such as the Sport England Active Design principles (2015)<sup>90</sup> are currently referenced. However, the adopted Plan does not have a policy that specifically deals with health and wellbeing related issues. This limits the influence the planning officers can apply to reducing health inequalities and leveraging any planning gain in relation to health and wellbeing as there is no specific policy from which to base justification requirements.

#### Question 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?

<sup>88</sup> <https://www.staffordshire.gov.uk/Care-for-all-ages/Health-and-wellbeing-board/Health-and-wellbeing-strategy-2018-2023.aspx>

<sup>89</sup> <https://www.england.nhs.uk/long-term-plan/>

<sup>90</sup> <https://www.sportengland.org/facilities-and-planning/active-design/>

11.9 One of the three objectives in Stafford Borough Councils Corporate Business Plan (2018-21)<sup>91</sup> is '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.' As part of this they have developed a 'Health in All Policies' approach to ensure that the health of local people is paramount in everything the Council does, and to support this since 2018 there has been a requirement for Officers to conduct a Community Impact Assessment on all new projects and for reports going to Cabinet. Currently there is no requirement for developers to conduct Health Impact Assessments on new developments.

11.10 If at *Question 11.A b* you considered that an alternative approach to the integration of health and well-being issues should be adopted there are a number of potential models that could be adopted:

- A.** A new specific policy for health and well-being is prepared which clearly identifies key principles for health improvement across developments and links up the cross-cutting themes with other relevant policies in the Local Plan.
- B.** A new specific policy for health and wellbeing is prepared which clearly identifies key principles for health improvement across developments and, at the same time, identifies new health and wellbeing requirements such as:
  - I. Full Health Impact Assessments to be conducted on large developments, and Community Impact Assessments to be conducted on small developments
  - II. Exclusion zones to be placed around schools to prevent new hot food takeaways opening.
- C.** Specific new health and wellbeing requirements to be placed in revised policy such as:
  - I. Full Health Impact Assessments to be conducted on large developments, and Community Impact Assessments to be conducted on small developments
  - II. Exclusion zones to be placed around schools to prevent new hot food takeaways opening

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<sup>91</sup><https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Policy%20and%20Plans/Corporate%20Business%20Plan%202018-2021.pdf>

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?

Do you consider that there is an alternative approach to this issue that might be considered?

If so please describe/give an example.

CONSULTATION

## 12. Connections



Barlaston Common

## Section 12 Connections

- 12.1 The delivery of sustainable transportation can be promoted through the best use of traffic and demand management schemes. To achieve this there are a variety of approaches which include:
- reducing the need to travel generally;
  - reducing the reliance on the private car for travel in urban areas;
  - encouraging more sustainable forms of transport (e.g. rail) for longer journeys; and
  - the provision of safe walking and cycling options for shorter journeys.
- These approaches are encouraged and supported by the objectives and initiatives of Government's transport policies, the Staffordshire Local Transport Plan (together with the Local Cycling and Walking Infrastructure Plan), and a Borough level Integrated Transport Strategy.
- 12.2 The main principles for delivering sustainable transport across the Stafford Borough area will be promoted in line with the National Planning Policy Framework (NPPF)<sup>92</sup>, whilst more detailed transport matters will be delivered through specific development proposals. NPPF sets out a number of transport issues to be considered through Local Plans and development proposals. These include:
- consideration of the potential impact of development on transport networks to realize opportunities from existing and proposed transport infrastructure / technology;
  - promoting the more sustainable forms of transport (walking, cycling and public transport) with significant development focused on sustainable locations;
  - the recognition that sustainable transport solutions differ between urban and rural areas;
  - seeking environmental net gain and high-quality places by identifying, assessing and avoiding or mitigating for adverse transport implications.
- The Stafford Borough Local Plan 2020-40 will have a particular role in achieving these objectives at a local level, as detailed below.
- 12.3 To support the New Local Plan the Borough Council will work closely with Staffordshire County Council (in its role of the local highways authority), other transport infrastructure providers (e.g. Highways England and Network Rail) and transport operators. Critically Stafford Borough will work with neighbouring authorities to support sustainable transport and align development patterns. This will be reflected through an Integrated Transport Strategy.

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<sup>92</sup> NPPF 2019, Section 9.

### 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

- 12.4 A range of measures are required to widen transport choices, as well as identifying and protecting sites and routes to develop transport infrastructure in conjunction with large scale developments. From a Local Plan perspective, it will be necessary to achieve an overall reduction in the demand for travel alongside a widening of transport choices, with a consequential modal shift away from the private car. In order to achieve this, it will be necessary to achieve an appropriate mix and distribution of uses across the Borough, as well as seeking to minimize the number and length of journeys through larger scale sites.
- 12.5 The principal planning-related mechanism to achieve this is to promote more effective integration of land use and transportation through the Borough's future Development Strategy. This will have an impact on the access to local day to day facilities either by walking, cycling, public transport or the private car. Similarly the location of new development that comprises of jobs, shopping, leisure and services can offer a range of sustainable travel choices depending on its location, including rail. Whilst high quality walking and cycling networks, together with supporting facilities will be promoted, it should be recognized that these transport choices to access to local services and facilities will still be largely restricted to more urban locations, with rural areas still relying on motorised personal transport (currently, predominantly car-based transport).

### 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?

- 12.6 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. Therefore, the local transportation

network is important for the day to day access requirement for people in Stafford Borough.

- 12.7 Development that would generate large levels of new traffic should have good access links to the main transportation networks in the Borough, including the railway stations at Stafford and Stone, to assist in avoiding long distance trips that would potentially increase the overall levels of congestion on the road network. Due to the excellent transport connections through Stafford Borough, particularly north to south along the M6 corridor, there has been an increase in the use of heavy good vehicles in the areas to service new employment locations as well as travelling through to other destinations.
- 12.8 New development through the Local Plan should not generate an increased level of usage for these vehicles along roads unequipped for such traffic. In addition, it has been recognized that the shortage of overnight lorry parking, particularly at Stafford and Stone, has led to parking of heavy goods vehicles in locations that lack proper facilities causing a nuisance to local residents. Therefore, new employment developments should include overnight lorry parking facilities to address this issue where there is a concentration of existing and new / expanded distribution centres.

#### Question 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.

- 12.9 The setting of local parking standards for residential and non-residential development should be considered through the New Local Plan. Local parking standards should be based on the accessibility, type, mix and use of development along with the availability of and opportunities for public transport and local car ownership levels. Additionally, ensuring adequate provision of spaces for plug-in and other ultra-low emission vehicles needs to be considered in order to achieve the Government's target to phase out hydrocarbon-fueled vehicles by 2040.
- 12.10 Due to the mixed urban/rural character of the Borough's area it may be appropriate to set minimum parking standards for residential and non-residential development, with only Stafford town being considered sufficiently well-served by public transport to justify any maximum car parking standards. Furthermore, it is important that sufficient quality and provision of car parking

facilities is available in all town centres across the Borough linked into the walking and cycling network.

- 12.11 NPPF recognizes that advanced, high quality and reliable communications is essential for economic growth and social well-being with expansion of electronic networks, including next generation mobile technology and full fibre broadband connections. The benefits of having a modern and accessible system of telecommunications, wireless and electronic methods across the Borough, including the rural areas and current “Not-Spots”, are obvious. The Government has stated an aim that there is universal access to 10Mbps broadband speed as a minimum.
- 12.12 Policies in the Local Plan will need to set out how high-quality digital infrastructure will be encouraged, supported, delivered and upgraded over time, with the priority being full fibre connections to existing and new development whilst keeping the number of additional radio and electronic communication masts to a minimum. Therefore, use of existing masts, buildings and other structures for new communication capability is to be encouraged, or where not possible new equipment sympathetically designed / camouflaged. Evidence will be required to demonstrate that significant and irremediable interference will not occur.

#### Question 12.E

Do you consider that a new policy setting out the approach to new electronic communication infrastructure, its extent and location is required for Stafford Borough?

Please provide a reason for your response.

stafford

# 13. Viability and Delivery of Development

00:11:44



Stafford Half Marathon

## Section 13 Viability and Delivery of Development

- 13.1 Local plans set out the contributions that developers must make to affordable housing and local infrastructure such as transport improvements, public open space and education.
- 13.2 National planning policy tells us that where an up to date plan sets out the contributions required, development should be assumed to be able to pay those contributions and remain financially viable for the developer. This puts the focus on testing development viability at the plan making stage.
- 13.3 The new local plan will set out the contributions to affordable housing and other infrastructure that developers need to make. These contributions need to be clearly set out in the plan and must be justified by evidence. We will use the evidence to prepare an Infrastructure Funding Statement setting out the anticipated funding from developer contributions and how these contributions will be used.
- 13.4 Recent changes to planning regulations removed the bar on 'pooling' or combining developers' contributions from more than five separate developments to pay for the same piece of infrastructure. This gives the Council more flexibility to use planning obligations to pay for infrastructure under the new plan.
- 13.5 Alongside seeking contributions from developments through planning obligations (commonly called section 106 agreements), Councils have the option to introduce the Community Infrastructure Levy (CIL). The CIL is a charge made on the floor area on new development in pounds per square metre. Unlike section 106 agreements, the CIL is designed to fund local infrastructure generally, rather than being tied to specific projects. The rate of CIL would need to be set at a level that balances development viability against the need for local infrastructure.
- 13.6 The main disadvantages of the CIL are that it is inflexible and may be expensive for the Council to administer. The CIL is inflexible in that all chargeable development must pay, even if viability is a challenge, and this may 'crowd out' other contributions like affordable housing.
- 13.6 The Council published a preliminary draft CIL charging schedule in 2015 but did not continue to adopt the CIL at that time. To adopt the CIL the Council would need to consult on and publish a new charging schedule setting out which types of development would pay and what the rate would be. The

charging schedule would be submitted with supporting evidence to an examiner for independent examination before it could take effect.

- 13.7 It is important to review the best way to fund the additional infrastructure needed to support development without undermining the delivery of the plan by overburdening development.
- 13.8 A whole plan viability assessment will be used to test the combined viability effect of proposed planning policies. This will also tell us whether or not it would be viable to introduce the CIL.

CONSULTATION

# 14. Monitoring and Review



High Street, Stone

## Section 14 Monitoring and Review

- 14.1 The purpose of monitoring and review will be to assess the delivery and implementation of the new Local Plan 2020-2040. The annually published Stafford Borough Authority Monitoring Report (AMR) provides a robust and effective review and monitoring approach for the Development Plan. Stafford Borough employ the period 1st April to 31st March for the AMR. Stafford Borough report on a range of indicators within the AMR including those detailed at Table 14.1.
- 14.2 A central element within the implementation of the new Local Plan will be the policies and proposals, which will need to be assessed in terms of their effectiveness through robust monitoring mechanisms. This will allow the performance of the policies in delivering the spatial vision, development strategy and strategic objectives to be assessed, and subsequently informs any change to policies or additional actions considered to be required.

Table 14.1 Indicators currently employed for the Stafford Borough Authority Monitoring Report.

Spatial Principle/Policy	Indicator
SP1 – Presumption in favour of Sustainable Development	Number of dwellings completed on Previously Developed Land (PDL) Percentage of completions at each level of the sustainable settlement hierarchy as set out in SP3
SP2 – Stafford Borough Housing and Employment Requirements	Net number of new houses delivered Number of net additional Gypsy and Traveller residential and transit pitches permitted and delivered Employment land available by type Amount of additional employment floor space by type
SP3 - Stafford Borough Sustainable Settlement Hierarchy	Percentage of additional dwellings provided in Stafford, Stone and Key Service Villages
SP4 - Stafford Borough Housing Growth Distribution	Number of new Houses built (net completions)
SP5 - Stafford Borough Employment Growth Distribution	Employment land Available by type delivered in Stafford Borough Amount of floor space developed in Stafford Borough
SP6 - Achieving Rural Sustainability	Amount of land and floor space developed outside key service villages Number of completed conversions of traditional rural buildings Number of Rural Exceptions Housing Completed

Spatial Principle/Policy	Indicator
SP7 - Supporting the Location of New Development	Percentage of completed dwellings at each level of the SP3
Policy Stafford 1 – Stafford Town	<p>Total Number of Net additional Dwellings delivered in Stafford Town over the Plan period</p> <p>Employment land available by type delivered on Strategic sites in Stafford Town</p> <p>Amount of additional employment floorspace by type in Stafford Town</p> <p>Monitor implementation and delivery of infrastructure projects necessary on strategic sites to bring the project forward</p> <p>Loss of employment land to non-employment uses</p>
Policy Stafford 2 – North of Stafford	<p>Net Number of Additional Dwellings</p> <p>Gross affordable housing completions</p> <p>Mixture of tenure and types of new dwellings</p> <p>Employment land Available by type delivered on Strategic sites</p> <p>Amount of additional employment floorspace by type</p> <p>Planning permission and completions of local community-based infrastructure and educational facilities</p> <p>Monitor implementation and delivery of infrastructure projects necessary to bring the project forward</p>
Policy Stafford 3 - West of Stafford	<p>Net Number of Additional Dwellings</p> <p>Gross affordable housing completions</p> <p>Mixture of tenure of new dwellings</p> <p>Employment land Available by type delivered on Strategic sites</p> <p>Amount of additional employment floorspace by type</p> <p>Planning permission and completions of local community based infrastructure</p> <p>Monitor implementation and delivery of infrastructure projects necessary to bring the project forward</p>
Policy Stafford 4 - East of Stafford	<p>Net Number of Additional Dwellings</p> <p>Gross affordable housing completions</p> <p>Mixture of tenure of new dwellings</p> <p>Employment land available by type delivered on Strategic sites</p> <p>Amount of additional employment floorspace by type</p> <p>Planning permission and completions of local community based infrastructure</p> <p>Monitor implementation and delivery of infrastructure projects necessary to bring the project forward</p>

Spatial Principle/Policy	Indicator
Policy Stone 1 - Stone Town	Total Number of Net Additional Dwellings delivered in Stone Town over the Plan period Gross affordable housing completions Mixture of tenure of new dwellings Employment land available by type delivered on Strategic sites Amount of additional employment floorspace by type Planning permission and completions of local community based infrastructure Monitor implementation and delivery of infrastructure projects necessary to bring the project forward Loss of employment land to non-employment uses
Policy Stone 2 - West and South of Stone	Net Number of Additional Dwellings Gross affordable housing completions Mixture of tenure of new dwellings Employment land available by type Planning permission and completions of local community based infrastructure Monitor implementation and delivery of infrastructure projects necessary to bring the project forward
Policy E1 - Local Economy	Amount and % of employment floor space developed on previously developed land Amount and type of land available Amount of employment land lost to other uses
Policy E2 - Sustainable Rural Development	Amount of employment-based planning permissions granted within rural areas Completions of Rural Exception Housing
Policy E3 - Development within Recognised Industrial Estates	Amount of new employment floor space granted planning permission within Recognised Industrial Estates
Policy E4 - Raleigh Hall and Ladfordfields Recognised Industrial Estates (RIEs)	Amount of new employment land granted planning permission on Ladfordfields and Raleigh Hall RIE's
Policy E5 - Major Developed Sites in the Green Belt	Amount of new employment land developed on Major Developed Sites Amount and % of employment floor space developed on previously developed land (PDL)
Policy E6 – Tourism	Number of Hotel spaces granted planning permission
Policy E7 - Canal Facilities and New Marinas	Number of new canal facilities or marinas developments granted planning permission

Spatial Principle/Policy	Indicator
Policy E8 - Town, Local and Other Centres	Amount of Floorspace for retail, leisure, office within Town Centres
Policy T1 – Transport	Number of planning permissions granted for major developments with secured Travel Plans
Policy T2 - Parking and Manoeuvring	For developments to meet the parking Standards set out in Appendix B
Policy C1 - Dwelling Types and Sizes	Monitor the mix of housing type (i.e flats / houses and sizes - i.e bedroom number.
Policy C2 - Affordable Housing	Annual number of affordable housing completions (gross)  Number of net completions of rural exception houses
Policy C3 - Specialist Housing	Number of new Extra Care units completed on an annual basis
Policy C4 - Housing Conversions and Subdivisions	N/A
Policy C5 - Residential Proposals outside the Settlement Hierarchy	Number of net completions of rural exception houses Number of inappropriate developments granted in the Green Belt
Policy C6 - Provision for Gypsies, Travellers & Travelling Show-people	Number of net additional Gypsy and Traveller residential and transit pitches permitted and delivered
Policy C7 - Open Space, Sport and Recreation	Number of planning permissions determined where a loss of sole community facilities is proposed. Recreational facilities provided in new developments
Policy N1 - Design	Number and % of housing sites (10+ dwellings) with the number of greens, ambers and reds
Policy N2 - Climate Change	Percentage of new developments with Sustainable Urban Drainage Systems (SUDs) Percentage of new residential developments built to zero carbon standard Percentage of new non-residential developments meeting relevant BREEAM level Percentage of household waste that is recycled or composted
Policy N3 - Low Carbon	Amount of renewable energy installed by capacity and

Spatial Principle/Policy	Indicator
Sources & Renewable Energy	type
Policy N4 - The Natural Environment & Green Infrastructure	Amount of new green infrastructure provided Change in areas of biodiversity importance
Policy N5 - Sites of European, National & Local Nature Conservation Importance	Change in areas of biodiversity importance
Policy N6 - Cannock Chase Special Area of Conservation (SAC)	Number of new applications granted planning permission contrary to SAC Partnership advice
Policy N7 - Cannock Chase AONB	Number of new applications granted planning permission contrary to AONB Partnership advice
Policy N8 - Landscape Character	Number of planning applications refused on landscape character grounds.
Policy N9 - Historic Environment	Number of Listed Buildings, Scheduled Ancient Monuments, Conservation Areas and Historic Parks and Gardens on the English Heritage 'At Risk' register Number of Listed Buildings Lost
Policy I1 - Infrastructure Delivery Policy	New Infrastructure provided
SB2 Social and Community Facilities	Amount of community land and floorspace lost to other uses

## 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?

If not please give a reason for your response

# 15. Next Stages



Stafford Farmers' Market, Market Square, Stafford

## Section 15 Next Stages

- 15.1 Please provide your responses to this Issues and Options consultation document to the Borough Council by 12.00 noon on Tuesday 31 March 2020 so that your views and provided information can be used in the next stage of the decision-making process. Please note that responses received after this deadline will not normally be considered unless prior agreement with the Forward Planning Team has been obtained.
- 15.2 In the course of the preparing the next stage document – the Council’s “Preferred Option”- the responses to this consultation document will be considered and a consultation summary document will be published. Further, the Council will continue to review the evidence base which under-pins the preparation of the new Local Plan and, where necessary, update it. Following the Preferred Options stage, the Council will consider the latest evidence (including the Preferred Option consultation responses) and will prepare the statutorily required Pre-Submission consultation stage document (Regulation 19 of the Town and Country Planning Act (Local Planning) (England) 2012).
- 15.3 Once the Regulation 19 Consultation has been completed the Council will formally submit the proposed Plan to the Secretary of State who will then request the Planning Inspectorate to conduct an independent examination of the proposed Plan. The appointed Inspector will assess whether the proposed Plan is appropriate, based on the Government’s latest tests of legal compliance and soundness as set out by the NPPF and other Government Guidance at that time. The Inspector will then issue a report for the Council to consider, on the basis of which the Council would hope to formally adopt the new Local Plan 2020-2040, which would replace the current Plan for Stafford Borough (2011-2031).

### Further Information

- 15.4 The relevant research studies and evidence on the New Local Plan can be viewed on the Stafford Borough Council Website<sup>93</sup>
- 15.5 If you wish to discuss this paper in more detail please contact the Forward Planning Team on 01785 619000. If you need this information in large print, Braille, other language or on audio cassette please contact 01785 619000
- 15.6 To help in making sure as many people as possible have a chance to hear about this work to date, Council officers will be available at a number of drop-in sessions to hear your views and discuss any part of the document. These

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<sup>93</sup> <https://www.staffordbc.gov.uk/new-lp-2020-2040-evidence-base>

events are intended to promote discussion and understanding of the emerging new Plan: as such for your opinions to be formally considered your consultation responses will still need to be submitted via the consultation process.

The Drop-In events will take place as shown at Table 15.1

Table 15.1 Issues and Options Drop-In sessions.

Date	Time	Venue
Monday 24 February	4pm-8pm	Jubilee Room, Eccleshall Community Centre
Weds 26 February	4pm-7pm	Hixon Memorial Hall
Saturday 29 February	Midday-4pm	Stafford Library
Tuesday 3 March	4pm – 8pm	Westbridge Room, Christchurch, Stone

## Appendix 1 Stafford Borough Council: sub-area “share” of housing need based on 2011 Census

	All categories: Dwelling type	Household spaces with at least one usual resident	% of all households	Share of 408 dpa
Adbaston	245	240	0.43%	2
Bradley	206	199	0.36%	1
Chebsey	230	224	0.40%	2
Church Eaton	275	264	0.47%	2
Creswell	158	150	0.27%	1
Eccleshall	2,116	2,011	3.61%	15
Ellenhall	55	50	0.09%	0
Forton	134	126	0.23%	1
Gnosall	2,114	2,048	3.68%	15
Haughton	467	451	0.81%	3
High Offley	411	398	0.71%	3
Hyde Lea	165	161	0.29%	1
Norbury	168	155	0.28%	1
Ranton	155	147	0.26%	1
Seighford	844	827	1.48%	6
Standon	332	318	0.57%	2
Whitgreave	84	80	0.14%	1
Rural West Total	8,159	7,849	14.09%	57
Barlaston	1,254	1,208	2.17%	9
Fradswell	72	68	0.12%	0
Fulford	2,611	2,521	4.53%	18
Gayton	67	65	0.12%	0
Hilderstone	244	235	0.42%	2
Hopton and Coton	316	301	0.54%	2
Ingestre	75	72	0.13%	1
Marston	63	60	0.11%	0
Milwich	184	175	0.31%	1
Salt and Enson	173	168	0.30%	1
Sandon and Burston	177	158	0.28%	1
Stone Rural	711	681	1.22%	5
Stowe-by-Chartley	172	168	0.30%	1
Swynnerton	1,384	1,326	2.38%	10
Tixall	112	104	0.19%	1
Weston	448	422	0.76%	3
Yarnfield	614	595	1.07%	4
Rural North Total	8,677	8,327	14.95%	61
Berkswich	794	762	1.37%	6
Brocton	454	445	0.80%	3
Colwich	1,987	1,946	3.49%	14

	All categories: Dwelling type	Household spaces with at least one usual resident	% of all households	Share of 408 dpa
Hixon	799	774	1.39%	6
Rural East Total	4,034	3,927	7.05%	29
Stone Town	7,434	7,179	12.89%	53
Stafford Town	29,206	28,421	51.02%	208
Stafford Borough	57,510	55,703	100.00%	408

Source: Stafford Borough Council EDHNA <sup>94</sup> - Derived from 2011 Population Census and the base housing requirement (Growth Scenario A).

<sup>94</sup> <https://www.staffordbc.gov.uk/new-ip-2020-2040-evidence-base>

## Appendix 2 Full list of Questions

Policy Theme and Questions	
<b>Question number</b>	<b>Section 1 – Introduction</b>
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?
	<b>Section 3 Vision and Strategic Objectives</b>
3.A.	Do you agree that the Vision should change?
3.B.	Do you agree that the Vision should be shorter?
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?
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?
3.F.	Should there be additional Objectives to cover thematic issues? If so what should these themes be?
	<b>Section 4 Sustainability and Climate Change</b>
4.A.	Efforts to increase energy efficiency within the borough are currently detailed in Policy N2 of the adopted Plan for Stafford Borough. However, the increasing recognition that more needs to be done to mitigate the effects of climate change suggests that measures in excess of this will now be necessary. a) Should the new Local Plan require all developments be built to a standard in excess of the current statutory building regulations, in order to ensure that an optimum level of energy efficiency is achieved? b) What further policies can be introduced in the Local Plan which ensures climate change mitigation measures are integrated within development across the borough?
4.B.	Which renewable energy technologies do you think should be utilised within the borough, and where should they be installed?

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?
4.D.	Should the council allocate sites for wind energy developments in the Local Plan? If so, where should they be located?
4.E.	Should the council implement a higher water standard than is specified in the statutory Building Regulations?
<b>Section 5 The Development Strategy</b>	
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.
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?
5.C.	In calculating the Housing Requirement figure for the New Local Plan 2020-2040 should a discount be applied to avoid a double counting of new dwellings between 2020 - 2031? If a discount is applied should it be for the full 6,000 new homes currently accounted for in the adopted Plan for Stafford Borough or a reduced number (please specify reasons)?
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.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?
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

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? 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.
5.H.	i) Do you agree that the only NPPF-compliant Growth Options proposed by this document are No. 3 (Disperse development across the new settlement hierarchy) and No. 5 (Disperse development across the new settlement hierarchy and also at the Garden Community / Major Urban Extension) and No. 6 (Concentrate development within existing transport corridors)? ii) If you do not agree what is your reason? iii) Do you consider there to be any alternative NPPF-compliant Growth Options not considered by this document? If so, please explain your answer and define the growth option.
5.I.	Do you think that it is appropriate, in order to take the development pressure off the existing settlements in the Settlement Hierarchy, that at least one Garden Community should be incorporated into the New Local Plan? Please explain your answer.
5.J.	What combination of the four factors: 1. Growth Option Scenario (A, D, E, F, G); 2. Partial Catch Up 3. Discount / No Discount 4. No Garden Community / Garden Community Should Stafford Borough Council put forward as its Preferred Option at the next stage of this Plan-Making process? Please explain your answer.
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.
<b>Section 6 Delivering Economic Prosperity</b>	
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? b) Allocate employment in both urban and rural areas?
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? If so, should the scope of such a policy be limited in any way? Please explain the rationale for your answer.

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?</p> <p>Please explain the rationale for your answer.</p>
6.G.	<p>a. Do you consider that a lack of suitable office space is a potential barrier to inward investment within the Borough?</p> <p>b. Where should the council seek to encourage the development of modern office space?</p> <p>Please explain the rationale for your answer.</p>
6.H.	<p>To assist the rural economy should the Council:</p> <p>a) Allocate land for employment purposes throughout the rural areas of the Borough?</p> <p>If so, which area(s) do you consider would be appropriate for this purpose?</p> <p>b) Extend existing rural business parks?</p> <p>If so, which ones?</p>
6.I.	<p>To assist the rural economy should the Council:</p> <p>a) Seek to allow for the expansion of rural business premises where this might be otherwise restricted by the relevant planning policies?</p> <p>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>
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>
6.K.	<p>Are there any further potential Major Developed Sites in the Green Belt that should be considered for inclusion?</p> <p>If so please provide details.</p>
6.L.	<p>The Visitor Economy is considered by Policies E6 (“Tourism”) and E7 (“Canal Facilities and New Marinas”) in the currently Adopted Local Plan.</p> <p>a) Do these Policies continue to be sufficient in their current form or do they need adjustment?</p> <p>If so, how?</p> <p>b) Are there any Visitor Economy themes that should be more explicitly addressed?</p> <p>If so, which?</p>

Policy Theme and Questions	
	<b>Section 7 Delivering Town Centres that address Future Needs</b>
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>
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?  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>
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.
	<b>Section 8 Delivering Housing</b>
8.A.	Should the council continue to encourage the development of brownfield land over greenfield land?
8.B.	<p>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?</p>
8.C.	Do you think that any adopted minimum density thresholds should reflect the availability of sustainable travel in the 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?
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?
8.I.	a) Should the Council consider a policy requiring bungalows to be delivered on all major developments? If so, should there be a minimum number or proportion of such bungalows for each development? b) Should the amount of land required for such bungalows be reduced by either limiting their garden size or encouraging communal/shared gardens? c) Is there a need for bungalows to be delivered in both urban and rural areas? d) Are there any other measures the Council should employ to meet the demand for specialist housing within the Borough of Stafford?
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?

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?
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	<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>
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>
<b>Section 9 Delivering Quality Development</b>	
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>
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.	<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>

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; 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.
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?
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.

Policy Theme and Questions	
9.I.	<p>Should the new local plan:</p> <ol style="list-style-type: none"> <li>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?</li> <li>2. Take a broader and more inclusive approach by explicitly encouraging the recognition of currently undesignated heritage assets, settlement morphology, landscape and sight lines?</li> <li>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.</li> <li>4. Encourage the maximisation of the wider benefit of historic assets by their incorporation into development schemes through imaginative design.</li> <li>5. Consider historic places and assets in the context of climate change permitting appropriate adaptation and mitigation measures.</li> </ol>
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>
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>
9.L.	<p>To support a new Local Design Review Panel should the new Local Plan:</p> <ol style="list-style-type: none"> <li>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?</li> <li>b. To adopt (and commit to delivering), nationally prescribed design standards; e.g. Manual for Streets, Building For Life, BRE Homes Quality Mark, etc.</li> <li>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.</li> </ol>
9.M.	<p>Do you consider the designation of sites as Local Green Space to be necessary through the new Local Plan?</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>
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>
<b>Section 10 Environmental Quality</b>	
10.A.	<p>The currently adopted Plan for Stafford Borough does not include any policies aiming to increase air quality levels. The new Local Plan provides an opportunity to amend this. Therefore, should the council;</p> <p>a) Ensure the installation of infrastructure to support the transition from petrol and diesel to electric powered vehicles on every major development?</p> <p>b) Ensure all major development is accessible by regular public transport?</p> <p>c) Enforce Air Quality Management Zones around areas of notable biodiversity importance?</p> <p>d) Employ any further methods which you consider will aid in the improvement of air quality within the borough?</p>

Policy Theme and Questions	
10.B.	<p>The currently adopted Plan for Stafford Borough does not enforce any policy to mitigate for the impacts of NO<sub>2</sub> particles on internationally designated sites.</p> <p>Therefore should the council enforce a scheme whereby any development likely to result in an increase of NO<sub>2</sub> deposition on these sites in Stafford Borough must contribute to a mitigation programme?</p>
10.C.	<p>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.</p> <p>Therefore, should the council;</p> <p>a) Consider a policy requiring all major developments to detail how they will provide infrastructure facilitating recycling and composting on site?</p> <p>b) Require developers to submit a strategy for how they will dispose of waste in a sustainable manner throughout the construction phase of development?</p> <p>c) Employ any further measures to increase the sustainable and efficient disposal of waste in Stafford borough?</p>
<b>Section 11 Health and Wellbeing</b>	
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>
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>
<b>Section 12 Connections</b>	
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>

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>
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>
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>
12.E.	<p>Do you consider that a new policy setting out the approach to new electronic communication infrastructure, its extent and location is required for Stafford Borough? Please provide a reason for your response.</p>
<b>Section 14 Monitoring and Review</b>	
14.A.	<p>a) Do you agree with the general approach to monitoring and reviewing New Local Plan policies and proposals?</p> <p>b) Are the currently employed indicators appropriate to monitor key planning policy issues? If not please give a reason for your response</p>

## Appendix 3 Glossary of terms

**Adoption** – The final stage of the plan making process. The plan is adopted by resolution of a full meeting of the Local Planning Authority (LPA). This formally confirms the plan as council policy.

**Affordable Housing (or sub-market housing)** – As per the Government NPPF definition: housing for sale or rent, for those whose needs are not met by the market. This includes: affordable housing for rent (such as social rent, affordable rent or at least 20% below local market rents), starter homes, discounted market sales housing, and other affordable routes to home ownership (such as shared ownership).

**Authority Monitoring Report (AMR)** – A report produced by the LPA to show how the Authority is performing against all agreed targets.

**Appropriate Assessment (AA)** – An assessment of the potential effects of a proposed plan – in combination with other plans and projects – on sites designated as part of a European network of designated nature conservation areas including Special Areas of Conservation (SACs). The Assessment itself is a statement that says whether the plan does, or does not, affect the integrity of the European site. The appropriate assessment forms part of the Habitats Regulations Appraisal (HRA) process.

**Area of Outstanding Natural Beauty (AONB)** - An area with statutory national landscape designation, the primary purpose of which is to conserve and enhance natural beauty.

**Biodiversity** - The whole variety of life encompassing all genetics, species and ecosystem variations, including plants and animals.

**Brownfield Land and Sites** - See 'Previously-Developed Land'.

**Climate Change** - Long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate, primarily considered to be the consequence of human activity and fossil fuel consumption.

**Community Facilities** – Community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community.

**Conservation Area** - Areas of special architectural or historic interest, the character, appearance or setting of which it is desirable to preserve or enhance.

**Core Strategy** – A Development Plan Document (DPD) which forms part of the Local Plan, that sets out the long-term spatial vision and spatial objectives for the LPA area and the strategic policies and proposals to deliver that vision.

**Cycle Network** - An integrated network of both on and off road routes to facilitate an easier and safer journey for cyclists.

**Density** - In the case of residential development, a measurement of either the number of habitable rooms per hectare or the number of dwellings per hectare.

**Design guide** - A document providing guidance on how development can be carried out in accordance with the design policies of a local authority or other organisation often with a view to enhancing local character.

**Development** - Development is defined under the 1990 Town and Country Planning Act as "the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land." Most forms of development require planning permission (see also "permitted development").

**Development Brief** - A document identifying the constraints and opportunities presented by a potential development site.

**Development Management** - The process whereby a local planning authority manages, shapes, and considers the merits of a planning application and whether it should be given permission having regard to the development plan.

**Development Plan** – Also known as the Local Plan, the term given to the documents setting out the adopted planning policies to guide development within the District. Decisions on planning applications are to be taken in accordance with the Development Plan unless material considerations indicate otherwise.

**Development Plan Documents (DPDs)** – Spatial planning documents prepared by the LPA and subject to Independent Examination.

**District Centres** - Usually comprising groups of shops and some services, separate from the town centre, but with more variety than local centres. Can include suburban centres.

**Economic Development and Housing Needs Assessment (EDNA)** - An objective assessment of the quantity and type of employment space and housing required within the Local Planning Authority area. This assessment incorporates the requirement within the NPPF to produce a Strategic Housing Market Assessment.

**European Site** Nature conservation sites afforded the highest level of protection in the UK through European legislation. They include Special Areas of Conservation (SAC), candidate (cSAC), Special Protection Areas (SPA), proposed (pSPA), European offshore Marine Sites and Ramsar.

**Evidence Base** – The researched, documented, analysed and verified basis for all the components of a Local Plan. The work used to create the Local Plan can be published in the form of background papers.

**Flood Plain** - Generally flat-lying areas adjacent to a watercourse, tidal lengths of a river or the sea where water flows in times of flood or would flow but for the presence of flood defences.

**Flood Risk Assessment** - An assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.

**Front-loading** - The important pre-production community participation processes involved in preparation of a Local Plan. The Statement of Community

Involvement (SCI), Local Development Scheme (LDS) and the Authority Monitoring Report (AMR) play a large part in ensuring front-loading.

**Garden Community** - new garden communities should make a significant contribution to closing the housing supply gap. Proposals may be for new Garden Towns (more than 10,000 homes) or Garden Villages (1,500-10,000 homes). A garden community may be a discrete new settlement, or it may take the form of transformational development of an existing settlement (both in nature and in scale). Garden communities should be largely self-sustaining and genuinely mixed use.

**Green Belt (not to be confused with the term 'greenfield')** – A statutory designation for open land around certain cities and large built-up areas, which aims to keep this land permanently open or largely undeveloped. The purposes of Green Belt are to:

- check the unrestricted sprawl of large built up areas;
- prevent neighbouring towns from merging;
- safeguard the countryside from encroachment;
- preserve the setting and special character of historic towns; and
- assist urban regeneration by encouraging the reuse of derelict and other urban land.

**Greenfield Land or Site** - Land (or a defined site) which has never been built on before or where the remains of any structure or activity have blended into the landscape over time.

**Green Infrastructure** - a network of green spaces and other environmental features including street trees, gardens, green roofs, community forests, parks, rivers, canals and wetlands. Green Infrastructure includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland.

**Gypsy** – Members of Gypsy or Travellers communities. Usually used to describe Romany (English) Gypsies.

**Gypsy and Travellers** – The Government defines Gypsies and Travellers for planning purposes as 'Persons of a nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

**Gypsy and Traveller Accommodation Needs Assessment (GTAA)** – An assessment of the accommodation needs of Gypsy and Traveller's which establishes the pitch requirements over the lifetime of the plan period.

**Habitat** – An area of nature conservation interest.

**Habitat Regulations Assessment (HRA)** – An assessment of the potential impacts of plans and programmes on sites designated as of European Importance for their nature conservation value.

**Heritage Asset** – A building, monument, site, place, area or landscape identified as have a degree of merit because of its heritage interest.

**Historic Landscape Assessment (HLA)** – seeks to identify, and as far as possible, understand the historic development of today's landscape. It places emphasis on the contribution that past historic processes make to the character of the landscape as a whole, not just selected 'special sites' and can contribute to a wider landscape assessment.

**Historic Environment Record (HER)** – A comprehensive resource of the historic environment of Staffordshire. It provides information about archaeological sites, historic buildings, historic landscape and other heritage features within Staffordshire. The baseline historic environment data contained in the HER underpins a wide range of work undertaken for the Historic Environment and decision making.

**Historic Parks and Gardens** - A park or garden of special historic interest. Grade I (highest quality), II\* or II. Designated by Historic England.

**Independent Examination** – An examination held in public by an Inspector appointed by the Secretary of State into the policies and proposals within a Development Plan Document (DPDs). The examination will consider the “soundness” of the document. Following the inspection, the Inspector will, where relevant, submit a report to the Local Planning Authority proposing possible amendments to the submitted plan.

**Irish Traveller** – Member of one of the main groups of Gypsies and Travellers in Britain. Distinct from Gypsies but sharing a nomadic tradition, Irish Travellers were recognised as an ethnic group in England in 2000.

**Issues and Options** – a non-statutory stage of the plan making process during which different spatial strategy, policy and site options may be considered and issued for consultation.

**Infrastructure** – The key services necessary to support development for example roads, sewerage, water, electricity, education and health facilities.

**Key Diagram** - The diagrammatic interpretation of the Spatial Strategy as set out in the Core Strategy Development Plan Document.

**Landscape Character** - The distinct and recognisable pattern of elements that occur consistently in a particular type of landscape. It reflects particular combinations of geology, landform, soils, vegetation, land use and human settlement.

**Lifetime Homes** – A standard comprising a range of design features to enable new housing to meet the changing needs of occupiers.

**Listed Building** - A building of special architectural or historic interest. Graded I (highest quality), II\* or II.

**Local Centre** - Includes a range of small shops and perhaps limited services of a local nature, serving a small catchment. Sometimes also referred to as a local neighbourhood centre.

**Local Development Document (LDD)** – A local planning document which can be either a statutory Development Plan Document (DPD) or a non-statutory Supplementary Planning Document (SPD).

**Local Development Scheme (LDS)** – A document setting out the LPAs programme for the preparation of the Local Development Documents (LDDs) within a three-year period and a timetable for their production and review.

**Local Nature Reserve (LNR)** – Sites of importance for wildlife, geology, education or public enjoyment.

**Local Plan** – A collection of statutory Development Plan Documents (DPDs) prepared by the LPA that sets out policies and allocations for delivering the economic, environmental and social aims of the area. SPDs may also be prepared to provide additional guidance to the policies contained in the Local Plan.

**Local Planning Authority (LPA)** - The local authority or council that is empowered by law to exercise planning functions. Often the local borough or district council.

**Local Strategic Partnership (LSP)** - An overall partnership of people that brings together organisations from the public, private, community and voluntary sector within a local authority area, with the objective of improving people's quality of life.

**Local Transport Plan** - A five-year integrated transport strategy, prepared by local authorities in partnership with the community, seeking funding to help provide local transport projects. The plan sets out the resources predicted for delivery of the targets identified in the strategy.

**Material Consideration** – A matter that should be taken into account in formulating planning policy and when determining a planning application.

**Ministry of Housing, Communities and Local Government (MHCLG)** – It is the aim of the Government to create sustainable communities. MHLGC is responsible for housing, planning, regional and local government, regeneration, social exclusion, neighbourhood renewal and the fire and rescue service.

**Mixed Use (or mixed use development)** - Provision of a range of complementary development on a site. This might include residential, community, commercial, retail and leisure uses..

**Monitoring (and review)** – The process of measuring (in terms of quantity and quality) the changes in conditions and trends, impact of policies, performance of the plan against its objectives and targets, and progress in delivering outputs. Please also refer to Annual Monitoring Report (AMR).

**National Planning Policy Framework (NPPF)** - The NPPF sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

**Nature Conservation** - The protection, management and promotion of wildlife habitat for the benefit of wild species, as well as the communities that use and enjoy them.

**Neighbourhood Centre** - A number of shops serving a local neighbourhood and separate from the district centre. Sometimes referred to as a Local Centre.

**Open Space** - All space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs, which can offer opportunities for sport and recreation. They can also act as a visual amenity and a haven for wildlife.

**Open Space Audit** – An audit of the open spaces within the District including an assessment of facilities and character.

**Out-of-Centre** - In retailing terms, a location that is clearly separate from the primary shopping area of a town centre but not necessarily outside the urban area.

**Plan-led System** - The principle that decisions upon planning applications should be made in accordance with adopted development plans (and DPDs), unless there are other material considerations that may indicate otherwise.

**Planning & Compulsory Purchase Act 2004** - The Act updates elements of the 1990 Town & Country Planning Act. The Planning and Compulsory Purchase Act 2004 introduced a statutory system for regional planning; and a system for local planning known as Local Development Frameworks (LDFs). The local planning system has since been subject to government reforms and the details of which were set out in the Localism Act 2011 and the National Planning Policy Framework (NPPF).

**Planning Obligations / S106 Agreements** – Contributions secured by the council to help provide or fund infrastructure items or services that will help to make development acceptable in planning terms.

**Preferred Options** – During formal public consultation on a Development Plan Document (DPD), the LPA will offer its Preferred Option and proposals: ie those options reasoned to be the most appropriate.

**Previously Developed Land (PDL) or 'Brownfield' Land** - Previously developed land is that which is or was occupied by a permanent structure including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

**Policies Map** – The component of a local plan showing the location of proposals in the plan, on an Ordnance Survey base map.

- Public Open Space** - Urban space, designated by a Council, where public access may or may not be formally established, but which fulfils or can fulfil a recreational or non-recreational role (for example, amenity, ecological, educational, social or cultural usages).
- Ramsar** – Ramsar sites are wetlands of international importance that have been designated under the criteria of the Ramsar Convention on Wetlands for containing representative, rare or unique wetland types or for their importance in conserving biological diversity.
- Renewable Energy** – Energy produced from a sustainable source that avoids the depletion of the earth’s finite natural resources, such as oil or gas. Sources in use or in development include energy from the sun, wind, hydropower, ocean energy and biomass.
- Rural Diversification** - The expansion, enlargement or variation of the range of products or fields of operation of a rural business (branching out from traditional farming activities, for example new income generating enterprise like renewable energy).
- Rural Exceptions Policy/Site** - A development plan or Development Plan Document may allocate small sites within rural areas solely for affordable housing, which would not otherwise be released for general market housing.
- Safeguarded Land** – A term to describe land that has been removed from the Green Belt to meet possible longer term development needs, beyond the current plan period.
- Sequential approach/sequential test** - A planning principle that seeks to identify, allocate or development certain types or locations of land before the consideration of others. For example, Brownfield housing sites before Greenfield sites, or town centre retail sites before out-of-centre sites.
- Site Allocations** – Sites that are proposed for development to meet the LPAs requirements set out in the Core Strategy. Policies will identify any specific requirements for individual proposals.
- Site of Biological Importance** – a local designation to indicate local biologically important sites.
- Soundness** - A term referring to the justification of a Development Plan Document. A DPD is considered “sound” and based upon robust evidence unless it can be shown to be unsound. Refer to paragraph 1.7 above.
- Spatial Development** - Changes in the distribution of activities in space and the linkages between them in terms of the use and development of land.
- Spatial Planning** - Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. That will include policies which can impact on land use (eg by influencing the demands on, or needs for, development), but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.

**Spatial Vision** - A brief description of how the area will be changed at the end of the plan period (often 10 – 15 years).

**Special Area of Conservation** – A site designated under the EC Habitats Directive and protected for its significant nature conservation value.

**Stakeholders** – People who have an interest in the activities and achievements of the Council, including residents, local communities of interest, partners, employees, customers, shareholders, suppliers, opinion leaders, regulators and “hard to reach” groups.

**Statement of Community Involvement (SCI)** – A Local Development Document (LDD) that sets out the standards which the LPA intends to achieve in relation to involving the community in the preparation, alteration and continuing review of all Local Development Documents (LDDs) and in significant development control decisions, and also how the local planning authority intends to achieve those standards.

**Strategic Environmental Assessment (SEA)** - A generic term used internationally to describe environmental assessment as applied to policies, plans and programmes. The SEA will form an integral part of the preparation process for all Local Development Documents (LDDs) and will be used to explain the environmental implications of policies and development as part of a Sustainability Appraisal (SA).

**Strategic Flood Risk Assessment (SFRA)** – Strategic Flood Risk Assessment is a tool used by the Local Planning Authority to assess flood risk for spatial planning, producing development briefs, setting constraints, informing sustainability appraisals, identifying locations of emergency planning measures and requirements for flood risk assessments.

**Strategic Housing and Economic Land Availability Assessment (SHELAA)** – Strategic Housing and Economic Land Availability Assessments are a key component of the evidence base to support the delivery of sufficient land for housing and employment to meet an identified need. These assessments are required by national policy set out in the National Planning Policy Framework (NPPF).

**Submission Stage** – The formal passing of the Development Plan Document to the Government for their assessment and examination.

**Sustainable Drainage Systems (SUDS)** – Measures to increase the permeability of surfaces therefore allowing a slower release of water.

**Supplementary Planning Documents (SPDs)** – A guidance document that supplements policies and proposals in the Local Plan. It will be subject to public consultation, but will not form part of the Development Plan or be subject to Independent Examination.

**Sustainability Appraisal (SA)** – The examination of a Local Development Document (LDDs) to ascertain whether its policies and proposals accord with the principles of sustainable development. The Sustainability Appraisal will incorporate a Strategic Environmental Assessment (SEA).

**Sustainable Communities** – Places where people want to live and work, now and in the future.

**Sustainable Development** - A widely used definition drawn up by the World Commission on Environment and Development in 1987: "development that meets the needs of the present without compromising the ability of future generations to meet their own needs". The Government has set out four aims for sustainable development in its strategy "A Better Quality of Life, a Strategy for Sustainable Development in the UK". The four aims, to be achieved at the same time, are: social progress which recognises the needs of everyone; effective protection of the environment; the prudent use of natural resources; and maintenance of high and stable levels of economic growth and employment.

**Sustainable Travel / Sustainable Transport** - Often meaning walking, cycling and public transport (and in some circumstances "car sharing"), which is considered to be less damaging to the environment and which contributes less to traffic congestion than one-person car journeys.

**Vitality** - In terms of retailing, the capacity of a centre to grow or develop.

**Windfall Site** - A site not specifically identified in the planning process, but which unexpectedly becomes available for development during the lifetime of a plan. Most "windfalls" are referred to in a housing context.

**Written Representations** - A procedure by which representations on development plans and DPDs can be dealt with without the need for a full public inquiry or independent examination.

**Written Statement** - A documentary statement supplementing and explaining policy, forming part of a development plan.

