

Stafford Borough Local Plan 2020 - 2040

Scoping the Issues Consultation Responses

Consultation Period: 18 July 2018 - 18 September 2018

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From: [REDACTED]
Sent: 25 July 2018 14:42
To: [REDACTED]
Cc: [REDACTED]
Subject: Local Plan Consultations
Attachments: Gnosall PC's response to Local Plan Consultation July 2018.docx

Members of Gnosall Parish Council's Planning Committee recently reviewed the current consultations on Draft Statement of Community Involvement and Strategic Housing and Economic Land Availability Assessment. Their comments were recorded and are listed on the attached document.

Regards

Jayne Cooper
Clerk, Gnosall Parish Council

[REDACTED]



Scoping the issues

- 1.12 Mentions NPs as part of the existing PfSB and therefore part of the statutory development plan until new plan adopted.
- 2.6 SBC CBP ought to mention hospital provision in its aim of providing a safe place to live.
- 3.7 Draft NPPF could be perceived as a threat. *It states that plans should identify opportunities for villages to grow and thrive, especially where this will support local services.* Developers have advanced that argument before, framing development as an opportunity to support existing business
- 3.8 Does this need to change in light of NPPF in favour of small builds?
- 3.14_ But developers have little interest in building anything other than executive homes. Profit before need.

From: [REDACTED]
Sent: 01 August 2018 11:30
To: [REDACTED]
Subject: New Local Plan Consultation Scoping the Issues Consultation Paper Settlement Assessment with Settlement Profiles

Thank you for including the MMO in your recent consultation submission. Please address further communications to [REDACTED]

The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response please email us at

[REDACTED] or telephone us on [REDACTED]

Kind regards,

Her Majesty's Government – Marine Management Organisation

[REDACTED]

[REDACTED]

From: Sue Bramall [REDACTED]
Sent: 07 August 2018 22:07
To: [REDACTED]
Subject: Scoping the issues response form
Attachments: Scoping the issues response form.doc.docx

Hello

Here is my response to the scoping the issues consultation document.

Regards
Sue Bramall
[REDACTED]

Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text" value="Mrs"/>	<input type="text"/>
First Name	<input type="text" value="Sue"/>	<input type="text"/>
Last Name	<input type="text" value="Bramall"/>	<input type="text"/>
Job Title (if applicable)	<input type="text" value="██████████"/>	<input type="text"/>
Organisation (if applicable)	<input type="text" value="██████████████████"/>	<input type="text"/>
Address Line 1	<input type="text" value="██████████████████"/>	<input type="text"/>
Address Line 2	<input type="text" value="██████████"/>	<input type="text"/>
Address Line 3	<input type="text" value="██████████"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text" value="██████████"/>	<input type="text"/>
Telephone Number	<input type="text" value="██████████"/>	<input type="text"/>
E-mail address	<input type="text" value="██████████████████████████████"/>	<input type="text"/>

Name or Organisation	<input type="text"/>
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Part B – Please use a separate sheet for each representation

Name or Organisation

Question 1

What would you like the Borough to be like in the future?

Aspire to better quality in terms of architectural design and landscaping. Developers seem to get away with low standards in the borough compared to elsewhere in the county.

Improved accessibility and provision for pedestrians, disabled and elderly, and tourists.

More independent retailers in a more attractive town centre. As the County town, we compare poorly with the likes of Chester and Shrewsbury – the uninspiring chain shops will never make Stafford a shopping destination.

Attract entrepreneurs and high-skilled staff with high-speed broadband (not just FTTC), ‘grand design homes’

Strong rural communities that have capacity for elderly to remain in their community as well as young people.

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

Economic –

- High speed broadband and mobile phone coverage– why is the borough so left behind?
- More parking at the station and signage on the approach from motorway to say which car parks have capacity – there is no use shaving 15 mins of train journey with HS2 if you have to add 15 mins to find a parking space.
- Housing policy needs to encourage self-build/ designer homes to attract high-flyers. Stafford has a reputation for saying “no, no, no ...” compared to Shropshire and Cheshire which recognise the benefits of attracting entrepreneurs and affluent residents to create jobs.

Housing –

- Deliver attractive, high-quality, individual, sustainable, lifetime homes that people of all ages desire – not just soulless identikit developments for first-time-buyers, young families.
- Ensure provision of lifetime homes/bungalows to accommodate the aging population or disabled for longer in their own homes – this will have a long-term benefit in reducing care costs.
- Take a positive approach to individual infill plots and encourage their use for bungalows/lifetime homes – this creates jobs for local architects, small building firms and artisan crafts people.
- Recognise that rural villages outside the KSVs need to grow too to maintain community – but not by moving all the elderly out to retirement complexes in the town.

Scoping The Issues Report: Response Form

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

Slindon Village had the opportunity for one new home and a car park for the church.

There was 100% support from all local residents and a Highways health and safety benefit, and no technical objections.

The planning officers and parish Council refused this popular local plan as it was “against policy” - ignoring local support for the proposal.

How can a project like this – with very strong local support – be incorporated into the plan?

How can local opinion be given more weight – what happened to localism?

Question 4

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

Most villages would cope well and welcome gradual growth – eg one new home every 3-5 years – as this would allow people to upsize/downsize within their community. Villages need starter homes AND bungalows.

Not all people who live in a rural area want to move to a town/starter home/retirement village when their children leave home and they wish to downsize. They may have animals or be keen gardeners and wish to stay in their rural community where they have a support network (even if there is no regular bus).

However, many of the planning permissions in the 8% for rural areas are simply sat upon by farmers who appear to have no intention of developing the properties. Consequently there is no remaining provision for areas outside the KSVs.

The recent call for sites is asking for sites with capacity for 6+ houses – which automatically restricts developments to commercial developers, rather than local people who may have an infil plot they would like to develop for themselves to retire or for their children - and they are likely to spend their money on local architects, builders and craftspeople.

Scoping The Issues Report: Response Form

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

This does not seem practical.

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

There are plenty of infill sites which are outside KSVs and not in greenbelt.

Most villages could accommodate one or two new houses every few years – and individual / self-build projects have good economic benefits locally – unlike mass building developments.

There is no need to jeopardise any greenbelt land in Staffordshire.

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

The last few years have seen a large number of starter homes / family homes – but other parts of the population have been neglected.

Given the aging population, there is a desperate shortage of bungalows. On rightmove there are only 23 bungalows today.

A small number of ‘grand designs’ houses should be welcomed to attract entrepreneurs / high-fliers who create jobs – if Stafford is to compete with Shropshire and Cheshire.

There was nothing inspiring on Rightmove (7 August) – just 4 houses over £600,000 within 5 miles of Stafford. Compare to 21 houses within 5 miles of Shrewsbury or 49 houses within 5 miles of Chester – and yet Stafford’s rail links are far superior.

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Why restrict self-builders to plots on large development sites? It is likely that any developer will make the plots high density as that is how they maximise their return on investment. They are likely to price the plots high to make up for the margin that they lose by not building. Also, they will use every trick in the book to get out of this – in the same way that they reduce the number of affordable homes that they are supposed to provide.

Why not encourage self-build on infill plots?

Question 9

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing which includes pitches for gypsies, travellers and travelling show people. Where should the Council look for suitable brownfield sites for new pitches?

Surely the council already knows where the brownfield sites are?

Question 10

What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

High speed fibre broadband – not just fibre-to-the-cabinet which is a con. This is essential for businesses.

Parking at the station is a major problem – which could at least be addressed by erecting signs as you enter the town to indicate which car parks have capacity.

Parking in Eccleshall is a problem for those that work in the town and visitors coming to spend money in the shops.

Business rates have killed the high streets in Stafford and Stone. Stafford town centre is now spread too wide, and it is hard to envisage it recovering without some radical changes – including more attractive architecture and landscaping.

Making the bough better for tourists – walkers, cyclists, elderly will benefit everyone.

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

It is not possible to comment on this without some analysis of supply and demand from commercial property agents.

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

The current neighbourhood plan hoards all development into the KSVs and is putting massive pressure on services and parking which have not kept pace – what is happening to the CIL contributions from these big developments?

Meanwhile rural villages are being starved of new housing and 'empty-nesters' are forced to stay put and 'bed-block' if they do not wish to move into a retirement village.

The lack of supply for the aging population in the rural areas is pushing up prices and will have a knock on effect on the care sector in time.

Equality and diversity is a key issue – but does not seem to be addressed in the Scoping document.

Scoping The Issues Report: Response Form

Question 13

What improvements would you like to see in those centres that you visit regularly? Should additional uses be supported other than retail such as residential, entertainment and restaurants? Please state the name of the centre in your response.

Eccleshall needs more parking,
Slindon needs more housing.

Question 14

What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?

Stafford town centre needs bringing back to life – what would Mary Portas advise?
There are already too many out-of-town developments, so no more are needed.
We need more provision for small independent shops – these are what make Shrewsbury and Chester and interesting shopping destination.

Question 15

Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres, and if so, where?

NO – the borough needs to help those existing retailers who are struggling to survive.

Question 16

What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?

A swimming pool in Eccleshall would be nice.

Scoping The Issues Report: Response Form

Question 17

National policy gives councils new powers to protect valued open spaces by designating them as Local Green Spaces. Are there any open spaces that are special to your local community which should be designated? If yes, please provide details of the open space, its location and the reason why it is special to you and your community.

The recent developments seem to include very little green space in terms of gardens and landscaping.
Can planning policy include a minimum area/ % of landscaping.

Attractive and affluent towns are often described as “leafy” and are attractive to tourists as well as residents.

Question 18

What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?

Have you asked U3A?

Question 19

19a What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?

A safe car park is needed for St Chad's in Slindon near Eccleshall.

19 b) Where should these be located/go?

Scoping The Issues Report: Response Form

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

What are the options?

There seem to be a lot of lorries on A519, which could go on motorway or A34.

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

Cycling is so popular now, but there are very few safe cycle / walking / wheelchair / pram paths in the borough. Why not be ambitious and aim to make Stafford the most pedal-friendly town by 2040? What would this take?

It would put the borough on the map and give us a real USP, as well as reducing emissions and ensuring a healthier population.

Presumably, there will be a need for more electric charging points.

Scoping The Issues Report: Response Form

Question 22

Any there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

See above re making the borough more attractive and accessible for pedestrians, cycles, wheelchairs and prams and mobility scooters.

This includes more safe footpaths in the countryside – as the roads are very dangerous to walk along and footpaths disappear. Eg from Eccleshall town to Pershall Park is very dangerous, so people drive.

Question 23

What economic development opportunities do you consider could arise from HS2 for the Borough?

The main thing that springs to mind is that parking at the station will be even more of a problem than it is now.

If the borough wants to attract day trippers / visitors, then it needs to give people a reason to come to Stafford – such as a major new gallery that would put the town on the map.

Scoping The Issues Report: Response Form

Question 24

Are there any specific transportation projects that the Council should be promoted in the Local Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.

As above re cycling.

Supporting community transport services which have started recently – such as the one in Eccleshall.

Question 25

National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally.

Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

What is local design panel? The document does not explain.

The recent developments seem to include very little green space in terms of gardens and landscaping. Can planning policy include a minimum area/ % of landscaping. Attractive and affluent towns are often described as “leafy” and are attractive to tourists as well as residents.

The plan should provide more clarity over “sustainable development” – do you mean designed to Code 6 standard?

Can you set design standards to include sustainable materials, more interesting architectural features (rather than identikit boxes).

Question 26

What could the Plan do to protect and enhance the Borough's Heritage Assets?

This seems to be done well by the heritage officer and Historic England.

Question 27

What approach should the Local Plan take to ensure that Borough's landscape, Area of Outstanding Natural Beauty and its key features are protected and enhanced?

Better maintenance of public footpaths including signage and access routes.

Scoping The Issues Report: Response Form

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

No

Scoping The Issues Report: Response Form

Question 30

Which renewable technologies do you think are most suitable for development in the Borough?
Please provide additional information as to why you deem these to be suitable.

Solar is Ok as doesn't spoil the skyline.

NO to wind turbines

Question 31

This document sets out the issues that need to be addressed through the new Local Plan. There may be matters that have been missed or that are not covered by the other consultation questions. Are there any matters you think also need to be considered at this stage and why?

You have not addressed equality and diversity – I believe a public body has a duty to do this.

This would highlight the issues such as:

- Bungalows/ housing for the elderly
- Footpaths for wheelchairs, mobility scooters and prams.

Thank you for your response on the New Local Plan

From: Sinclair, Christina [REDACTED]
Sent: 14 August 2018 16:44
To: [REDACTED]
Subject: Stafford - Scoping the Issues, Historic England response [Aug 18]
Attachments: Stafford - Scoping the Issues, Historic England response [Aug 18].pdf

Dear Sir/Madam,

Thank you for consulting Historic England regarding the above. Please find attached our advice at this early stage, which I hope you find helpful.

Kind regards,

Christina Sinclair | MSc MA BArch IHBC

[REDACTED]

[REDACTED]



We are the public body that helps people care for, enjoy and celebrate England's spectacular historic environment, from beaches and battlefields to parks and pie shops.

Follow us: [REDACTED]

[REDACTED]

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By Email:

[REDACTED]

Date: 14
August 2018

Dear Sir/Madam

STAFFORD NEW LOCAL PLAN: SCOPING THE ISSUES REPORT

Thank you for consulting Historic England on the above. This response details the broad expectations of the Local Plan for Stafford with regard to the historic environment. It is good to have the opportunity to comment at this early stage, and we offer the following advice which I hope you find helpful. I have structured this letter using the questions raised, which I hope is clear for your consideration purposes.

Broad advice

Stafford's new Local Plan will be expected to include a proper description, identification and assessment of the historic environment, based upon a robust evidence base regarding heritage information. The plan will need to demonstrate how it conserves or enhances the historic environment of the area and how the presumption in favour of sustainable development should be applied locally. This includes ensuring that the sites which it is proposing to put forward for development, will assist in delivering such a strategy.

We advise that the following advice documents are used to develop the Local Plan from the early stages;

- The Historic Environment in Local Plans: <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>
- The Historic Environment and Site Allocations in Local Plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>
- Sustainability Appraisal and Strategic Environmental Assessment: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>
- Decision-taking in the Historic Environment: <https://historicengland.org.uk/advice/planning/decision-taking/>
- The Setting of Heritage Assets: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>



[REDACTED]
[REDACTED]

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Question 1

Our overall vision and expectations for the Local Plan with respect to the future ‘vision’ for the borough would be one in which;

- The heritage of the area is well understood as a result of a robust evidence base in line with our guidance (see above), including; the particular characteristics and significance of heritage assets in the area, the contribution they make to quality of life and other local plan objectives, the issues facing them now and in the future, and the positive opportunities they represent.
- There is a positive strategy for the conservation and enhancement of the historic environment, taking into account the local characteristics, significance, contribution, issues and opportunities found in the evidence base (see above). This would include a dedicated strategic policy for the conservation and enhancement of the historic environment, robust development management policies for heritage sites and careful consideration of site allocations with associated site policies.
- Is in line with our advice notes provided in in the ‘broad advice’ section above.

Question 2

We are concerned that no mention of the historic environment is made in the associated text. The conservation and enhancement of the historic environment should be identified as a key outcome, alongside the environmental, social, community and economic benefits with which it is associated. Our ‘Heritage Counts’ webpages provide detailed information on this: <https://historicengland.org.uk/research/heritage-counts/>. Robust consideration should also be given to the quality of the evidence base, with clear conclusions drawn from this to direct specific outcomes (see above).

Question 4

Facilitating villages and associated communities which ‘grow and thrive’ is a strong aim, and the historic environment could play a very beneficial role in achieving this. For example; by informing new design to create a strong sense of place, by fostering a strong sense of community through the conservation-led regeneration, or the reuse of a historic building for community use. Our webpages on ‘heritage works’ may be of use to you in considering these positive opportunities: <https://historicengland.org.uk/images-books/publications/heritage-works/>.

Question 5

We encourage you to carefully consider the historic environment at an early stage with respect to considerations for sites and densities. This includes having ‘special regard’ and giving ‘great weight’ to the conservation of designated heritage assets and any contribution made by their setting in line with your statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework. At this early stage, we refer you to our guidance on the subject above, most notably that on site allocations.

Question 12 & 14

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



The significance of all heritage assets, including any contribution made by their setting, merits careful consideration in line with the NPPF and statutory duties. With particular regard to any expansion of Stafford, we would raise at this early stage the particular sensitivity of the setting of heritage assets, including but not exclusive to the setting of Stafford Castle and Bury Ring Hillfort.

Question 15

We would helpfully raise that careful consideration should be given for the development of large-scale town centre uses in locations outside existing established historic retail centres, as these can draw activity away from historic high streets. This can result in vacancy in historic centres, missed opportunities for public engagement and enjoyment, as well as often costly future regeneration schemes.

Question 26

The statements in the associated text (3.60-3.64) are welcome, and appropriate cross-reference the contribution that the historic environment makes to areas such as the local economy, local distinctiveness, communities and tourism. Good reference is also made in broad terms to some forms of characteristic heritage asset types of the area, and there is also clear recognition that the conservation and enhancement of the historic environment should be a proactive exercise within the local plan.

In broad terms, we would also encourage consideration to be given to proactively pursuing opportunities to aid in the promotion, understanding and protecting of heritage assets as a means of maximising the wider public benefits they contribute. As above, a robust evidence base will be key in identifying what the plan can do to best protect and enhance the borough's heritage assets.

Question 27

We would note here that the borough's landscape, including the AONB, is a 'cultural landscape' which has been shaped by the area's history and human activity over the centuries. As such, the historic environment is a notable element of the borough's landscape that merits careful consideration. As you will be aware, the Cannock Chase AONB is currently undergoing a Management Plan review and it would be beneficial to liaise with the historic environment information available as a result of this process.

Question 31

We would add that cross-subject thinking with regard to the historic environment will be a beneficial exercise, to establish inter-relationships which should be considered. Page 4 of our document 'The Historic Environment in Local Plans' provides a useful set of considerations in this regard.

Next steps

We advise that the emerging Local Plan is developed in line with our advice above, which I hope is helpful to you. This early stage consultation is very welcome, as it enables us to provide helpful initial broad advice to aid you in developing a robust Local Plan. We look forward to ongoing engagement as the plan develops.



[REDACTED]

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Yours sincerely

Christina Sinclair
Historic Environment Planning Advisor
Historic England

[Redacted]
[Redacted]



[Redacted]
[Redacted]

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



From: Catherine Renfrew [REDACTED]
Sent: 16 August 2018 15:10
To: [REDACTED]
Cc: [REDACTED]
Subject: New Local Plan: Scoping the Issues - Consultation
Attachments: 160818 J035136 SBC Reg 18 consultation.pdf; Scoping the issues response form.pdf; Site plan.pdf

Hello Team,

We submitted a site earlier in the year for your consideration as part of the 'call for sites' exercise. Given that we are unsure whether the ongoing Local Plan review takes into account recent call for sites, please find attached our 'Representation' for the open Reg 18 Local Plan consultation - New Local Plan: Scoping the Issues – Consultation.

Best regards,
Catherine

Catherine Renfrew
Planner

GL Hearn Limited
[REDACTED] [REDACTED]



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Scoping The Issues Report: Response Form

Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

**2. Agent's Details
(if applicable)**

Title	<input type="text"/>	Mr
First Name	<input type="text"/>	Alban
Last Name	<input type="text"/>	Henderson
Job Title (if applicable)	<input type="text"/>	Associate Director
Organisation (if applicable)	<input type="text"/>	GL HEARN
Address Line 1	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text" value="REDACTED"/>
Postcode	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail address	<input type="text"/>	<input type="text" value="REDACTED"/>

Name or Organisation	GL Hearn for Severn Trent Water
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Part B – Please use a separate sheet for each representation**Name or Organisation****GL Hearn for Severn Trent Water****Question 1**

What would you like the Borough to be like in the future?

For all responses please refer to accompanying Representation.

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?



Our ref: 160818_J035136 Scoping the Issues –REG18

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

By email: [REDACTED]

16 August 2018

Dear Sir/Madam,

Stafford Borough Council - New Local Plan: Scoping the Issues - Consultation

Submission on behalf of Severn Trent Water – Land at Gnosall Heath

GL Hearn acts on behalf of Severn Trent Water ('STW') in relation to its land interests within the Stafford area and has been instructed by STW to submit a response to the ongoing Local Plan Reg 18 Issues consultation. This Representation comes following our submission to the 'call for sites' earlier in the year.

STW is a regulated utility company with statutory responsibilities for the provision of water and sewerage services across the English Midlands and Central Wales. As a result of changing processes in relation to clean water provision and wastewater treatment, significant areas of land are no longer required by the business for operational purposes and as such are surplus to requirements. STW is currently undertaking a programme of rationalising its land holdings and is seeking to dispose of redundant operational assets for alternative uses through a process of Irrevocable Sign Off (ISO). Proceeds from the asset disposal are reinvested back into the core business to improve services for its customers.

Land at Gnosall Heath:

Please find enclosed the completed form and site plan associated with Severn Trent Water's surplus land holding at Gnosall Heath. The site, approximately 0.8ha to the north of Gnosall Heath, forms part of an old sewage treatment works and adjoins an active pumping station to the east- which will remain operational. To the north of the site are a series of functioning allotments, and to the south, a publicly accessed, dis-used stretch of the National Route 55 railway line, which separates the site from a number of large detached/semi-detached residential dwellings.

At this stage, we would welcome the site to be considered as part of the ongoing review of the Council's Local Plan, and meet with the Council, to discuss the development opportunity that the site may be able to provide, in terms of contributing, and delivering a number of residential and/or employment units for the area.

Should you have any queries in respect of the enclosed, require any further information, or wish to discuss the site's potential further, please do not hesitate to contact GL Hearn on [REDACTED]

Yours sincerely,

Alban Henderson
Planning Associate Director
[REDACTED]



Site: Gnosall Heath land off Station Road A518 (access owned by STW)

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

16th August 2018

Falmouth Action Group

Falmouth Avenue

Stafford

ST17 0JG

Dear Falmouth Action Group

Local Green Space – off Falmouth Avenue

Thank you for making us aware that you have submitted an application to Stafford Borough Council for the land off Falmouth Avenue to be designated as Local Green Space. As a regular user of this piece of land we wholeheartedly support this application. To us it is a “little gem” in an oasis of housing estates particularly as more and more of Stafford appears to be being turned into more housing.

I have no doubt that the Borough council will try and state that we live on the doorstep of Cannock Chase which has AONB status BUT it is not accessible to everyone. In our very busy life we do not find it a sensible use of our time to drive to the Chase whereas it is so much more sensible for our health to walk our dogs from our home so we choose to walk along the canal nearby which is lovely for us but fails to satisfy our second dog Woody who is a natural ball chaser and we cannot throw balls along by the canal for obvious reasons as the path is not wide enough nor suitable for this. We love to walk both of our dogs along the canal and then up onto “Rabbit Hills” as this land is affectionately known by all of the locals.

Here we can experience the sheer joy of watching our beloved Woody chase his ball until he is tired, our other dog then gets left alone by his sibling to allow him some “quiet” time just being a dog without being annoyed by his younger sibling. We get such joy just watching them enjoy being dogs, off lead and able to venture off the path in the undergrowth following whatever smell they pick up. We cover several circuits of the site and this includes walking up and down the steep hillsides which ensures that we get some excellent aerobic exercise ourselves whilst walking our much happier dogs. There is always something to see from this site whether it's other dogs which is positive dog

socialisation (when our dogs were young puppies we deliberately visited the site as much as we could to socialise them and they are now so good with other dogs. We see children cycling and making up cycle jumps, we see people using it for exercise purposes, we love to see children playing hide and seek and it is clear from the people that you pass when walking there that not everyone walks a dog some clearly walk just to enjoy the open space which is good for their mental health.

We have walked home having identified something on a tree or bush and tried to find out what it is such as the Oak Gall Wasp, different butterflies, moths, birds and plants. We see people of all ages from the young to the very elderly and we have often thought wouldn't it be nice to have seating around the site for the older generation to come along and just sit and observe life and perhaps even socialise. We have been told of previous plans for housing on this site and would do our utmost to campaign against it. Modern housing estates now don't have much garden, so dogs don't get to behave like dogs by running and chasing things so for both our health and our dog's health please don't allow this beautiful open space to be changed and we must endeavour to keep it as open green space for generations to come as not everyone can drive to Areas of Outstanding Natural Beauty.

If we can be of any help in any way shape or form, please feel free to make contact and we will do our best to assist.

Assuring you of our continued support,

Kind regards

Sandra and Peter Sammons, Milo and Woody

From: [REDACTED]
Sent: 14 August 2018 21:15
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Local Green Space - off Falmouth Avenue

Dear Sir/Madam,

I'm writing in support of the above local green space as this area is incredibly important to me and my family.

It offers a wonderful escape on our doorstep from the busy world we live in.

I use it to clear my head and blow the cobwebs away after a stressful day at work and at the weekend for some peace and quiet.

I've lived locally for 17 years and have brought my children up here and as youngsters they also enjoyed the area too.

It would be devastating to our community to ever lose this area to an already over development world.

Kind Regards

Adrienne Bodger.

[REDACTED]

Sent from my iPhone

CURRENT USERS OF THE LAND OFF FALMOUTH AVENUE

Name: DAVID MILLER

Address:

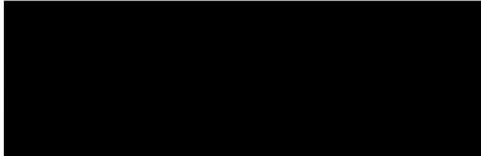


Please complete the following three statements:

1. I have been using the local green space for⁸.....year(s).
2. I use the local green space.....⁷.....times per.....^{week}.....
3. I use the local green space for: *walking my dog.*

I confirm that all the facts provided in this statement are true.

Signature:



Date:

14/8/18.

From: JOHN SHARKEY [REDACTED]
Sent: 17 August 2018 17:36
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Local Green Space- off Falmouth Avenue

Dear Sirs, I am more than a little concerned that the Council requires evidence that the Green Space off Falmouth Avenue is of particular significance to the local community when really one only has to walk on it to take in the fact that this area is probably the only green space in Stafford that has hills and valleys available to the public, and especially the youngsters, to enjoy.

Whilst I am one of the more senior members of the public and can no longer gambol and frolick in the unique landscape of this piece of land I have four grandchildren and every year over the last ten years they have all , together with their friends made this land their base for many activities. At present my youngest tells me she is there at least two to three times a week with her friends. During the recent very hot weather they have fully enjoyed the benefit of their group being able to sit in the shade provided by the trees.

Apart from the youngsters there are always people with or without dogs making full use of this unique facility.

It, surely must be a prime consideration of the Council, with the huge amount of housing development taking place in the Baswich/Weeping Cross area to have some space for residents to enjoy the freedom of open natural areas and Falmouth Avenue is the ideal area for leisuretime.

Quite frankly I am astounded that any plans for development on this land can even be considered and would be extremely annoyed, and disappointed, if the Council did not continue to keep Falmouth Avenue in its present state,

Incidentally my wife concurs fully with my comments.

Your faithfully

John Sharkey
[REDACTED]

From: HASLAM DAVID [REDACTED]
Sent: 21 August 2018 09:59
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Local Green Space - Off Falmouth Ave

Dear Sir/Madam,

My family and I moved to this address in [REDACTED]. At that time, in addition to this green space, we had a public open space to the rear of Falmouth Ave (even numbers) which could be accessed by all via a path between numbers 24 and 26.

This land was subsequently subdivided and sold off to the adjoining residents – precious few gained but the local public lost out. Since then the only local facility available for health and wellbeing is the green space opposite Falmouth Ave (odd numbers).

My wife and I enjoy walking and use this land twice or three times a week. When the family comes to stay this frequency increases as it is a safe area for the grandchildren to run free. They use it for bird and train spotting as well as fruit picking.

As there is no nearby alternative we would view it as a loss of amenity, convenience and wellbeing – not forgetting the loss of local flora and fauna.

Regards

D A Haslam

From: Lee Harwood [REDACTED]
Sent: 21 August 2018 18:16
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Local green space off Falmouth Avenue

Dear Sir/Madam,

I am writing to let you know of my usage of the local green space off of Falmouth Avenue.

I have been a resident on Torrington Avenue for 19 years and regularly use the green space for a variety of reasons. I am a keen birdwatcher and wildlife enthusiast and enjoy the opportunity to see the wildlife on my frequent walks. As a PE teacher, I also use this area for fitness purposes, running several times per week. The area is of extreme value to my personal physical and mental health.

In summer, I fruit pick and in winter our family enjoy sledging using this area.

Many thanks,

L. Harwood

Sent from my iPad

From: Planning [REDACTED]
Sent: 29 August 2018 10:26
To: forwardplanningconsultations
Subject: Consultation response - Theatres Trust
Attachments: 20180829 Scoping the issues response form - Theatres Trust.docx

Good Morning

Please find attached a consultation response on behalf of Theatres Trust.

Kind regards,

Tom Clarke MRTPI
National Planning Adviser

Theatres Trust

[REDACTED]

Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title

Mr

First Name

Tom

Last Name

Clarke MRTPI

Job Title

National Planning Adviser

(if applicable)

Organisation

Theatres Trust

(if applicable)

Address Line 1

[REDACTED]

Address Line 2

[REDACTED]

Address Line 3

Address Line 4

Postcode

[REDACTED]

Telephone Number

[REDACTED]

E-mail address

[REDACTED]

Name or

Organisation

Theatres Trust

Part B – Please use a separate sheet for each representation

Name or Organisation	Theatres Trust
-----------------------------	-----------------------

Question 1

What would you like the Borough to be like in the future?

It is not within the Trust's remit to comment on the wider aspects of sustainable development or strengths of the local area, but Stafford and also other settlements within the Council's boundary contain a number of valued cultural facilities. The Trust has recently commented on proposals for a new arts centre in Stafford and community theatre in Stone. We suggest that the Plan's vision and objectives make reference to the strength of the area's cultural offer, and that the Plan seeks to protect the facilities that are valued by local people as well as promote new and enhanced facilities where there is a need. In particular, a strong cultural offer will become increasingly important in supporting the health and vitality of town centres so there is scope for culture to be referenced within that context.

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

In terms of outcomes, as alluded to above we would suggest that the Plan seeks to protect facilities that are valued and considers the role that cultural uses can play in supporting the role and function of the borough's town centres to help minimise vacancy and ensure town centres are active and well-used at different times of day and night.

Scoping The Issues Report: Response Form

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

N/A

Question 4

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

We would suggest the Plan contains a strong policy covering community, cultural and social facilities protecting facilities from unnecessary loss. Such a policy should require robust demonstration that a facility is no longer required by the community and that genuine efforts have been made to maintain the facility including marketing at a price/rent appropriate to existing use without development potential and condition. In terms of local villages and communities, it can be made explicitly clear that such a policy covers facilities such as community halls and public houses as these provide opportunities for the community to come together and also provide opportunities for engagement in cultural activities.

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

N/A

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

As reflected in our comments above, it will be important that the Plan affords flexibility for non-retail uses to come forward that will help minimise vacancies and improve the overall mix of uses within the town centres.

Question 19

19a What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?

We support the proposal for a new studio theatre in Stone, and if this development does not come forward as envisaged or has not been delivered by the time the Plan is in place we would suggest the Plan promotes the delivery of a community-scale theatre/arts centre within Stone.

19 b) Where should these be located/go?

N/A

From: Rajvir Bahey [REDACTED]
Sent: 24 August 2018 14:03
To: forwardplanningconsultations
Subject: Local Plan Scoping the Issues Report Consultation Representations Sport England

Dear [REDACTED]

Thank you for consulting Sport England on the Local Plan Scoping and Issues Report.

Please see below comments on the document.

General - Sport England welcome that the authority are updating its evidence base relating to playing pitches, built and indoor facilities in line with NPPF paragraph 96. Whilst the level of growth to be planned for in the Local Plan is not certain at this point in time the final evidence base document should be aligned.

Para 3.34 – to achieve an environment that encourages activity in our daily lives it is considered that the emerging plan should contain policies that reference Active Design. Active Design (October 2015), produced by Sport England in conjunction with Public Health England, is a guide to planning new developments that creates the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. The document can be downloaded via the following link: <http://www.sportengland.org/activedesign>

3.36 and Q16 – Note that the NPPF states planning policies should be based on robust and up to date assessments of the need for open space, sport and recreation facilities and opportunity for new provision. The production of a playing pitch, built and indoor strategy will inform what the current and future demands are for sport and leisure facilities. It should be noted that demand for sport and leisure facilities do not necessarily have to be new facilities and instead could be met for example by refurbishments of existing facilities and pitch quality enhancements.

Q21 - The plan should seek to embed Active Travel into development proposals delivering environments that encourage walking and cycling.

Should you wish to discuss the above comments further or wish to have discussions on draft policies please do not hesitate in contacting me.

Rajvir Bahey
Planning Manager
[REDACTED]

From: Bevins, Hannah [REDACTED]
Sent: 23 August 2018 09:36
To: forwardplanningconsultations
Subject: Response on Behalf of National Grid
Attachments: Local Plan Consultation -Scoping the Issues & Settlement Assessments REP 09.08.18.pdf

Dear Sir/Madam,

Please find the attached response on behalf of National Grid.

Kind regards

Wood Plc on behalf of National Grid

[REDACTED]
[REDACTED]
[REDACTED]

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

Hannah Lorna Bevins
Consultant Town Planner



Sent by email to:



9 August 2018

Dear Sir / Madam

**Stafford Borough Council: New Local Plan Consultation – Scoping the Issues & Settlement Assessment
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Hannah Lorna Bevins
Consultant Town Planner



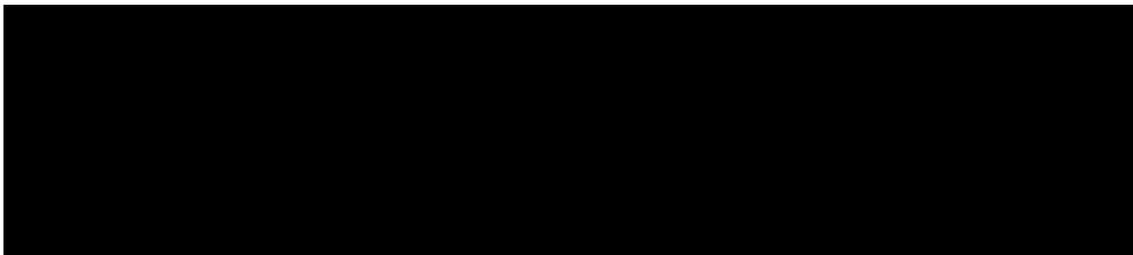
Spencer Jefferies
Development Liaison Officer, National Grid



Yours faithfully

[via email]
Hannah Lorna Bevins
Consultant Town Planner

cc. Spencer Jefferies, National Grid



From: Chris Curtis [REDACTED]
Sent: 24 August 2018 15:50
To: [REDACTED] forwardplanningconsultations
Subject: Local Green Space off Falmouth Avenue

Dear Sir/Madam,

I write in support of the application to SBC for the land off Falmouth Avenue to be designated as local green space.

I have lived in Stafford for fifty years, at Rickerscote, Western Downs, the area adjacent to the RAF camp and also now in Baswich.

I have lived adjacent to the area of land off Falmouth Avenue for the last seventeen years at the address of [REDACTED] and it is literally unique for the residents of this area and should be designated a green space.

During those years I have raised my children and socialised / looked after their friends and used the area in question almost daily, when the weather permits. (Even in poorer weather we have been able to socialise with numerous residents and their children particularly during snowy weather when many local people use the slopes for safe sledging and watching over their children.)

The area is unique in providing a recreational area to walk and observe wildlife in addition to providing a pathway to the local canal and opening up literally miles of canal towpath from there to Shugborough and in the opposite direction to Wolverhampton.

I have along with friends who live on this estate been able to quite simply sit in the sun watching our children play the way we are able to do years ago when going into fields and being in the presence of wildlife were daily occurrences. Now it isn't the same and the small green areas left in housing estates do not provide the type of experience and education that this unique piece of land enables. Over the years hundreds and thousands of local people have visited to watch the rabbits and wildlife taking a break from the pace of life to recreate and also educate our young children about nature.

I would like to highlight a less considered aspect of the areas use. I am aware of people who have make jams from the blackberries which can be picked, sold them at local scouts and parish fairs and made money for charities in doing so - the cycle of education and selflessness for our young people to learn from is hardly recreated in any other area of Stafford with the exception of possibly picking up the disused railway line from Stafford Rugby Club and into Derrington. I notice that the Derrington local community have been able to secure their own magnificent area for their community presumably for all the same reasons that the area at the back of Falmouth Avenue should be preserved for this community.

In addition the area off Falmouth has an incredible diversity of wildlife that includes bats, moths, extremely diverse amounts of birds and consequently why the eco system in the area supports huge numbers of rabbits, hedgehogs which search through gardens in the evenings, foxes, badgers and in extremely difficult weather

deer also arrive which are fed by local residents. It is rare for such nature to be so close to urban areas and for the local population to be able to live in harmony with it. Undoubtedly the most significant legacy of this area of land is the education of all who use it, particularly children, in living with wildlife, respecting the need to recycle and conserve, respect for nature and to be a better balanced individual. In a world where creating real life experiences rather than computer generated visual technology the area is a unique part of this area of Stafford. I believe that SBC have a responsibility to develop the Borough but also to recognise when compromise is needed and original ways of life preserved. The use of this land has always been for the local community and they in turn have used it respectfully and with a love for what it offers in return.

Therefore, I wish to register my support for this extremely valuable and unique area of Stafford to be preserved for the future Staffordians who will live in this area so that their lives can be enriched in the same way that so many others have been in the past.

Kind regards.

Chris Curtis



From: SHALENDRAN RAMAKRISHNAN [REDACTED]
Sent: 25 August 2018 11:28
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Local Green space - off Falmouth avenue
Attachments: img-180825104619.pdf

Hi

Enclosed please find our user statement for the Green space - Off Falmouth Avenue.

Thanks and regards

Shalendran

[REDACTED]

Name: SHALENDRA RAMAKRISHNAN

Address:

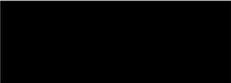


Please complete the following three statements:

1. I have been using the local green space for⁵.....year(s).
2. I use the local green space....²....times per...^{Day}
3. I use the local green space for: dog walking, fitness, fruit picking.

I confirm that all the facts provided in this statement are true.

Signature:



Date: 25-8-2018

From: NOTTINGHAM PETER [REDACTED]
Sent: 28 August 2018 12:30
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: CURRENT USERS OF THE LAND OFF FALMOUTH AVENUE

CURRENT USERS OF THE LAND OFF FALMOUTH AVENUE

FROM Pete & Pat Nottingham

ADDRESS [REDACTED]

We are submitting this email as a statement of our use of that land and its pleasures that it provides.

We are one of the privileged people who own a property overlooking the land, we can witness all the activities that this small area of established wild country side between the road and the railway that has given myself and all the other users who pass my house the joy of using it.

My Reasons for wanting this to stay as the small area of established wild country side are as follows.

1. The natural beauty that it projects from the sights, sounds and smells that change all year around on a daily basics.
2. The wild life that uses the established wild country side and feed off it such as the birds including migrating birds, rabbits, foxes, badgers, hedgehogs, deer's and Bats at certain times of the year during darkness.
3. The reason I purchased my house many years ago was for the direct access to this land so that my children could play on it as they where friends of the families that rented the horses fields from the council.
4. Since the council stopped renting the land it has not been managed but allowed to grow into an established area used by all, the residents have created maintained footpaths for access such as walking dogs direct access for school children going to and from school, people going on longer walks via the canal, these paths could now be seen as unofficial local public rights of way footpaths.
5. We use the small area of established wild country side as recreational area to enjoy the walk in the country side as it gives a different dimension to the housing estate to relax in with out using a car to travel too, our children have had many hours of fun playing on that land from exploring to winter sports giving them the education of life in a safe environment without travel. I feel all estates should have an common communal area like this.
6. I wish to share an experience with you, recently my son and grandchildren came from Gloucester and stopped with us, what did the want to do first? go and play in the small area of established wild country side as it one of the things they remember as the bygone fun times in Stafford.

To Summarise I feel that any housing on this land would be detrimental to this community we would lose all the above and dog walkers may resort to letting dogs run / foal on football pitches / playing fields etc, children may start to hang around the shops as their chill out areas. I would like the council to support its community and give this area official common ground status.

I confirm that all the facts provided in this statement are true

[REDACTED] Pete Nottingham 28/08/2018

From: Elaine Elstone [REDACTED] on behalf of Julie O'Rourke
Sent: 30 August 2018 15:22
To: forwardplanningconsultations
Subject: NEW LOCAL PLAN: SCOPING THE ISSUES - CONSULTATION
Attachments: 0608-26.m3.pdf; Proposed Standard Mortgagee Exclusion Clause.pdf

Please find attached letter and document in respect of the above.

Regards.

Elaine Elstone
Secretary
TETLOW KING PLANNING



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

Date: 30 August 2018

Our Ref: JOR M3/0608-26

By Email Only:

Dear Sirs

RE: NEW LOCAL PLAN: SCOPING THE ISSUES - CONSULTATION

We represent the **West Midlands HARP Planning Consortium** which includes all the leading Housing Association Registered Providers (HARPs) across the West Midlands. Our clients' principal concern is to optimise the provision of affordable housing and to ensure the evolution and preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the region.

As significant developers and investors in local people, HARPs are well placed to contribute to local plan objectives and act as long-term partners in the community. Along with reading this representation, we encourage the Council to consider the points we raised about retaining affordable housing *in perpetuity* which was previously sent on behalf of the Consortium.

Question 4: How could the new Local Plan support local villages and their communities to grow and thrive?

The NHF Home Truth's report 2017/2018 highlights that too few homes are being built to meet needs, with a shortfall of 40,600 homes across the region - including the substantial shortfall of 19,000 homes attributable to Birmingham. Across the West Midlands there is a need to deliver 10,285 dwellings per annum and around 3,599 affordable housing dwellings (35%) but in 2015/16 only 1,340 affordable dwellings were delivered - just 37% of the annual affordable housing target (CLG Live tables, 2017).

The Council has a significant need for new affordable housing over the plan period; the Council should be seeking to maximise its housing target to increase delivery over the plan period. This should be consistent with the PPG and revised NPPF (2018) which requires consideration of the level of affordable housing need, and affordability issues generally (for example lower quartile house price: income ratios), as market signals potentially requiring uplift in the overall target figure.

The timing of the Council's new Local Plan indicates a significant opportunity to be both proactive and imaginative in securing the delivery of affordable housing in villages; drawing upon best practice of the HARP Members and embracing new and emerging delivery mechanisms. The standard practice of securing affordable housing through s106 planning obligations should be pursued and set at an appropriate level in accordance with a viability appraisal.

Registered Providers working in partnership with LPAs can be the catalyst to significantly increasing the supply of affordable homes. We would recommend looking to involve Housing Associations as far as possible in setting a local definition of affordable housing that will encourage delivery of all affordable housing types. As the presumption should always be in favour of on-site affordable housing delivery, the preference for early engagement with local Housing Associations should be emphasised in the Plan policies.

Question 5: Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

We do not support any potential introduction of a range of densities for the Borough as minimum densities can cause problems in terms of viability for Registered Providers. Instead the Council should make a commitment to support development that makes efficient use of land in accordance with paragraph 123 of the revised National Planning Policy Framework (July 2018) (NPPF).

If minimum densities are set to be applied within the area then any optional space standard should be applied across all tenures and not just affordable. Applying standards to only affordable housing development can cause problems in terms of viability and as market schemes can be developed at higher densities where the standard is applied to affordable housing only, this has left Registered Providers in the position of being unable to compete on an equal basis with other developers for land.

Question 7: National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

Ageing Population

The Council should seek to understand the scale of need for older persons' accommodation through detailed analysis of the Borough's ageing demographic as it is clear that there is a significant projected increase across England. It is vital that the Council ensures its evidence considers the range of housing models which may be required, as guided by the PPG (which is currently being updated to reflect the revised NPPF). The Council should also assess the level of specialist older persons' affordable housing needs to inform policy. Once this has been assessed the evidence should be translated to a separate policy fully representing the need for specialist housing and care for older people in Stafford Borough. An exemplar policy is set out below for guidance:

"The Council will, through the identification of sites and/or granting of planning consents, provide for the development of residential care homes, nursing homes, close care, extra care and assisted care housing, and Continuing Care Retirement Communities which encompass an integrated range of such provision.

In identifying sites and/or determining planning applications, regard will be had to:

- *Commission for Social Care Inspection and other operational requirements;*
- *Locational sustainability. Suitable sites at defined settlements will be prioritised, but where such sites are not available, regard will be had to the availability of public transport and the potential for developments to be self-contained, thereby reducing travel requirements;*
- *The potential to co-locate a nursing/residential care home and other care related accommodation on the site where there are demonstrated needs."*

Question 31: Are there any matters you think also need to be considered at this stage and why?

Affordable housing in perpetuity

Government guidance states that affordable housing may be secured for future eligible households, however the requirement for affordable housing to be retained *in perpetuity* in planning policies is only raised in relation to housing delivered on rural exception sites. The term has a clear legal meaning which is recognised within the new NPPF (2018). This principle is appropriate and supported by our members on rural exception sites as this helps to secure land for delivery of affordable housing in rural areas where housing delivery would otherwise not be supported.

Securing affordable housing *in perpetuity* more widely is not supported for a number of reasons, foremost of which is that it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. As the availability of public grant funding has been significantly restricted in recent years, the

ability of Registered Providers to obtain private finance for the development of new affordable housing should not be further restricted by unnecessary Section 106 clauses.

As well as restricting future ability to recycle housing stock where necessary to respond to local circumstances, and when used in a rigid fashion also prevents tenants from being able to staircase to full home ownership in intermediate affordable housing. This latter point is particularly critical as inability to staircase to full home ownership depresses interest in such housing, as potential purchasers look instead to Help to Buy products. This is unhelpful as it restricts Registered Providers' ability to fund development over the long term; as receipts from the sales of shared ownership properties are funnelled directly back into delivering more affordable housing it is perverse to prevent staircasing. We ask that the Council reconsider this approach and look to other mechanisms where necessary, allowing Registered Providers to recycle public subsidy to reinvest in new stock. Securing affordable housing through conditions and Section 106 Agreements can be achieved without further restricting development potential.

We have enclosed a Proposed Standard Mortgagee Exclusion Clause wording for your information.

We would like to be notified of further consultations on the new Local Plan by email only to [REDACTED]. Please ensure that the **West Midland HARP Planning Consortium** is retained on the consultation database, with Tetlow King Planning listed as its agent.

Yours faithfully

[REDACTED]

**Julie O'Rourke MPLAN MRTPI
Planner**
For and On Behalf Of
TETLOW KING PLANNING

[REDACTED]

Enc.: Proposed Standard Mortgagee Exclusion Clause

Cc: [REDACTED]

Proposed Standard Mortgagee Exclusion Clause

The [affordable housing provisions] in this Agreement ***[DN: cross-referencing the specific provisions would be preferable]*** shall not be binding on a mortgagee or chargee (or any receiver (including an administrative receiver) appointed by such mortgagee or chargee or any other person appointed under any security documentation to enable such mortgagee or chargee to realise its security or any administrator (howsoever appointed) including a housing administrator (each a **Receiver**)) of the whole or any part of the [affordable dwellings] or any persons or bodies deriving title through such mortgagee or chargee or Receiver PROVIDED THAT:

- such mortgagee or chargee or Receiver shall first give written notice to the Council of its intention to dispose of the [affordable dwellings] and shall have used reasonable endeavours over a period of three months from the date of the written notice to complete a disposal of the [affordable dwellings] to another registered provider or to the Council for a consideration not less than the amount due and outstanding under the terms of the relevant security documentation including all accrued principal monies, interest and costs and expenses; and
- if such disposal has not completed within the three month period, the mortgagee, chargee or Receiver shall be entitled to dispose of the [affordable dwellings] free from the [affordable housing provisions] in this Agreement which provisions shall determine absolutely

From: JEFFREY WILSON [REDACTED]
Sent: 01 September 2018 21:13
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Falmouth Avenue

[REDACTED]

Dear sir or madam .

01/09/2018

I have been using this green space for the last 18 years. I use this green space three times a day where I walk my dogs and walk the children looking at the wildlife such as birds and rabbits. I keep active by running on this local green space which helps my wellbeing.

Please don't take this away from our community.

I confirm that all these facts provided in this statement are true.

Jeffrey Wilson

From: Anne-Marie Armour [REDACTED]
Sent: 02 September 2018 23:38
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Application for land off Falmouth Avenue to be designated as Local Green Space

Dear Sir/Madam,

I am writing to express my support for the application for Rabbit Hills (land off Falmouth Avenue) to be designated as Local Green Space.

We use it for walking, for recreation and also for exercise. Open areas like Rabbit Hills encourage people to get outdoors – they are less likely to do it in an overcrowded urban environment, as opposed to a restful green space. Rabbit Hills provides a peaceful non-built-up area and room for larger trees which small modern gardens cannot accommodate.

Rabbit Hills is also important for children as a place to play. It stops other areas from getting overcrowded and gives teenagers somewhere to go, which makes anti social behaviour in other open spaces less likely.

Our four children go there at least once a day. They run, make noise, climb trees, build dens and explore. This is also important to other people in the area who don't have to put up with them doing those things within earshot.

This is an area that the local community can access easily, rather than having to jump into a car and drive down to the Chase. Its existence encourages outdoor activity as an everyday thing rather than something you have to plan for, thus making it more likely to happen. It is a relatively small area but is of great importance to the local community.

Rabbit Hills also provides a home for wild life, necessary as modern gardens are increasingly small with no space for wild life. It is of historical importance, being previously known as Stockton Common, as described by Laura Husselbee in her book 'Down By Jacob's Ladder'.

Please consider favourably the application for this land to be designated as Local Green Space.

Yours faithfully,

Anne-Marie Armour

Malcolm Armour
[REDACTED]

From: Richard Calderbank [REDACTED]
Sent: 03 September 2018 17:09
To: ForwardPlanning
Subject: FW: Stafford New Local Plan Scoping The Issues Report
Attachments: Stafford New Local Plan New Local Plan Scoping the Issues Report .pdf; ASHFLATS - A1 LOCATION PLAN LP01 @ 2500.pdf

Further to the attached report, please find attached a location plan of the site.

Please can you confirm receipt?

Kind regards

Richard

Richard Calderbank
Land Buyer
Seddon Homes Ltd

[REDACTED]

Seddon Homes.co.uk  

[REDACTED]

From: Richard Calderbank
Sent: 03 September 2018 15:46
To: [REDACTED]
Subject: Stafford New Local Plan Scoping The Issues Report

Dear Sir / Madam

Please find attached Seddon Homes Ltd representations with regards to the Stafford New Local Plan: Scoping The Issues Report.

Please can you confirm receipt of the representation?

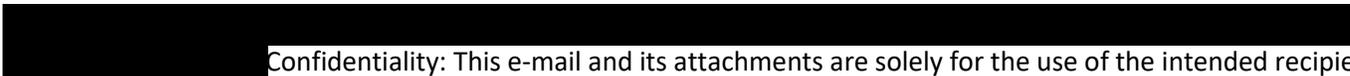
Kind regards

Richard Calderbank
Land Buyer

Seddon Homes Ltd



Seddon Homes.co.uk  



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There would be objection to any policy proposing strict density targets to be met. A flexible range of densities, with the ability to deviate from these where specific circumstances dictate, is more aligned to the provisions of the NPPF.

Question 6 – National policy states that the Council should priorities the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

The revised NPPF does place a large emphasis on encouraging the re-use of brownfield land in a bid to meet an areas housing needs. However, there is no sequential assessment set out that requires all brownfield land to be considered in the first instance before any greenfield sites can come forward. Therefore, for the new Local Plan to include any such sequential test would be contrary to the provisions of the NPPF, and not be supported.

The thrust of the revised NPPF is the delivery of sustainable development, noting at paragraph 10 “so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”. The measure is, therefore, whether a site/scheme is sustainable not whether or not it is on a brownfield or greenfield site.

Land south of Ash Flats is a greenfield site but does form a logical extension to Stafford Town and provides an excellent opportunity to widen housing choice in the Town and across the Borough. The Scoping the Issues Report (paragraph 2.3) notes that due to the accessibility and level of services within Stafford Town, it could be a key focus for major new development. Whilst the site is located outside of the current settlement boundaries, it was referred to as a sustainable location for housing in the Inspectors Report for the Local Plan Part Two. It was only discounted on the basis that the site was not needed at that time. However, given the Local Plan is now being reviewed, this provides an opportunity for sustainable sites, such as Ash Flats, to be re-considered.

The site is well contained due to existing development to the north (residential) and east (commercial) and the presence of the M6, Stafford to Birmingham railway and the A449 main road. The fact the site is well contained with strong physical boundaries, means that its development would not encroach into the open countryside.

There are a number of bus stops located within close proximity of the site which offer regular journeys into Stafford Town Centre, providing easy access to a significant range of services and facilities. In addition, paragraph 2.3 of the Scoping the Issues Report, sets out that the Town of Stafford is located on a national road and rail network with the highest level of services and facilities.

There are no technical constraints which would prevent development from being delivered and a suitable and safe access off Moss Pit Lane can be achieved. Overall, the site is suitable to accommodate residential development, with no constraints to hinder deliverability.

Paragraph 72 of the revised NPPF does indicate that urban extensions can often provide a solution to delivery of a large supply of new homes, stating (emphasis added):

“the supply of large numbers of new homes can often be best achieved through planning for large scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.”

Therefore, there is an acceptance at the national level that sites, such as land at Ash Flats, can offer a solution to providing additional housing land required to meet the needs of the Borough. Sites such as this should not automatically be discounted as the Local Plan progresses.

Question 7 – National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

Whilst it is important that a mix of housing is provided to meet the needs of a community, each site and scheme should be treated on an individual basis in terms of the final mix delivered. This will allow schemes to be tailored to meet the needs of the community at that moment in time and respond to market conditions.

The intention is that the new Local Plan covers a period from 2020 to 2040 and it is likely that housing needs will change over this twenty-year period. Therefore, having ridged policies that require a specific mix of housing to be provided could quickly become dated and not achieve the objective of meeting the needs of the community; therefore, such policies are not supported.

Question 8 – The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self-build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

The Stafford Borough Self-Build and Custom Housebuilding Register (October 2017) has only 25 entries of people registering an interest in obtaining a self-build plot. Of these 25; only four identified Stafford as the location for the required plot. This evidence suggests there is limited interest and appetite for self-build plots across the Borough, but in particular within Stafford.

Based on this evidence, we would not support a policy requiring a percentage of large sites to be made available for self-build; as there is currently only very limited demand. Reserving parts of the developable area of a site for self-build where there is no interest for it, is likely to affect overall scheme viability as these reserved areas are likely to remain empty.

At this stage, there is no evidence to support a percentage of large sites being reserved for self-build plots.

Question 25 – National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

Ensuring high quality developments are delivered is important. We would welcome a willingness from the Council to engage at early stages of site promotion to offer feedback and guidance, including on elements of design where necessary, so that comments can be taken on board before an application is submitted. The NPPF encourages pre-application and early engagement, noting the potential this has to improve the efficiency and effectiveness of the planning application for all parties.

However, we would not support a mandatory requirement for pre-application engagement with the local design panel prior to an application being submitted. Whilst pre-application engagement has the potential to reduce matters of disagreement / difference once an application has been submitted, there are instances where timing / programme do not allow for lengthy or prolonged

pre-application engagement. Local design panels can sometimes work on the basis of only having monthly meetings, therefore, providing a single opportunity each month to obtain feedback. If this was the case, a requirement to meet with the local design panel prior to submitting an application could cause delays and impact on programme.

Yours sincerely

A solid black rectangular redaction box covering the signature area.

Richard Calderbank
Land Buyer

A solid black horizontal redaction bar covering a line of contact information.A solid black horizontal redaction bar covering a line of contact information.

LOCATION PLAN

Rev.	Date	Revision Description	Drawn



Client	Milwood
Project	Ashfats Lane, Stafford
Drawing Title	Location Plan
Drawing No.	1272 MWD/AFS-LP01

Revision	Checked
Drawn	
Scale: 1:2500 @ A1	Approved
1:5000 @ A3	
Drawn	21st Oct 2013
E-mail:	

From: DAVID DUNN [REDACTED]
Sent: 04 September 2018 14:04
To: [REDACTED] forwardplanningconsultations
Subject: Local Green Space - Off Falmouth Avenue

I am writing to you in connection with the debate regarding the local green space off Falmouth Avenue, specifically with regard to the value of the said space in the life of the local community.

I have lived in the vicinity of Falmouth Avenue since 1973 and, from the outset, used the space as a means to access the canal and in recent years as a community open space. When the space was used as a paddock, there was still access and much was made of it. When the old railway-gang access path (with the remains of an old railway building adjacent to the tracks) was blocked, access was provided by a footpath- and that in itself is well-used.

With regard to the fields, known locally as the 'Rabbit Hills' (a name that emerged through constant use) the value of the space for the local community is enormous. In the course of decades I have accessed it in the early mornings (with dogs), in the daytime - weekdays and weekends - and early evenings. Very seldom have I been there on my own, encountering others making use of the space. Over time - years! - we have come to know faces (and dogs!), if not always names. Indeed, the nature of the space is clear when anyone crosses it - for there are regular routes that are clear to see for anyone who cares to look. Apart from anything else, it acts as a space of encounter.

In time the adjacent areas have been built on, with the spur out from Falmouth Avenue and - more extensively - houses spreading from Baswich Lane onto the once open land. Indeed, it should come as no surprise that over the years - as we have walked the area - there has been speculation that we ought to use the land while we may, given what looks (for those with another vision) like a neat opportunity to link the areas of expansion with a 'simple infill' to complete a ring of housing. Perhaps there is an assumption that the Falmouth Avenue area would be a mere 'infill' or completion project.

Were that to take place, in my view, a most valuable asset to the community would be lost, never to be recovered. It can hardly be described as a place of quiet contemplation, given the adjacent railway, but it is a valued space nevertheless. It is a place 'to be', a place to meet, a place to play, a place to take exercise (perhaps, for some, their only opportunity) and valuable for all that. It is a de facto nature reserve on our doorstep, without such status, but valued as such. It is a place for birds - and rabbits - and it is a space that affords views across relatively open country - the sewage works notwithstanding.

It is our local green space and I hope that it will be registered as a Local Green Space - warranting additional protection. It is here, where we live and it is manifestly an asset for our community. I hope that it will continue to be regarded - formally - as such for decades to come. I would like others to experience the space as I have .

Dr David J.Dunn

From: Stacey Worden [REDACTED]
Sent: 06 September 2018 12:59
To: forwardplanningconsultations
Subject: Scoping the Issues Consultation response
Attachments: Scoping the issues response form Eccleshall PC.pdf

Hi
Please see attached response from Eccleshall Parish Council.

Kind Regards

Stacey Worden
Clerk to Eccleshall Parish Council
[REDACTED]

[REDACTED]

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Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Mrs	
First Name	Stacey	
Last Name	Worden	
Job Title	Clerk and Responsible Financial Officer	
(if applicable)		
Organisation	Eccleshall Parish Council	
(if applicable)		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number		
E-mail address		

Name or Organisation	Eccleshall Parish Council
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Part B – Please use a separate sheet for each representation

Name or Organisation	Eccleshall Parish Council
-----------------------------	----------------------------------

Question 1

What would you like the Borough to be like in the future?

The Parish Council identified the need to ensure the regeneration of the North end of Stafford town centre, to ensure it is more vibrant with occupation of empty properties.

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

- Health – the return of the 24 hour Accident and Emergency function of the County Hospital, and ensuring all hospital facilities meet the needs of the growing local population.
- Comprehensive Education facilities at all levels, to encourage the return of more higher education provision within the Borough, and to ensure further education is retained in Stafford, rather than courses being taught more in the partner college in Newcastle Under Lyme.
- It is vital that consideration is given to a supporting infrastructure of services that will grow along with the increase in housing developments within the Borough.
- To ensure the preservation of current environmental areas of importance at all costs.
- To ensure employment/retail areas and support services are easily accessible from residential areas, which may include the provision of good public transport links.

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

- A reduction in HGV thoroughfare
- More car parking areas
- An increased provision of bus services, which at present is likely to further decline in 2019 with the removal of a key commuter and school link service.
- Increased infrastructure provision to support a growing population.

Question 4

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

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

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

Specifically, expansion of local health service provision to support a growing, and ageing, population.

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

Current density levels should be retained as to be sustainable.

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

The Borough Council does not appear to prioritise brownfield sites.

In order to encourage developers to take on brownfield sites which are more expensive to build on, it may need to consider allocation of grants to support the additional costs.

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

Provision of bungalows and smaller houses that can be bought for people wishing to downsize. This housing should be for sale as opposed to social housing rental schemes.

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Question 9

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing which includes pitches for gypsies, travellers and travelling show people. Where should the Council look for suitable brownfield sites for new pitches?

Question 10

What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

It is key to provide better transport networks throughout the Borough to allow resident access to opportunities.

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

Additional land allocated for employment should have clear access to major arterial transport routes, rather than in rural areas where excessive HGV and commercial traffic is not suitable for the smaller roads.

If better broadband connections were in rural areas, this would allow for the development of smaller businesses in areas outside of the town centre, and support the outlying key service villages.

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

Key challenges include:

- High rents
- Changes in shopping patterns
- Lack of car parking

Question 13

What improvements would you like to see in those centres that you visit regularly? Should additional uses be supported other than retail such as residential, entertainment and restaurants? Please state the name of the centre in your response.

Stafford would benefit from park and ride facilities, free car parking/larger car parks.

Eccleshall – any new residential developments should contribute to parking in the town.

Question 14

What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?

Question 15

Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres, and if so, where?

Eccleshall PC is in favour of regeneration within the town centre.

Opportunities to expand leisure in Eccleshall should be considered, such as adding bowls/play area to existing tennis and cricket club to create a better overall complex.

Question 16

What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?

Eccleshall PC are in favour of informal open spaces for play which includes ball play areas

Facilities of a more diverse nature should be considered, such a climbing walls, zip wires.

Scoping The Issues Report: Response Form

Question 17

National policy gives councils new powers to protect valued open spaces by designating them as Local Green Spaces. Are there any open spaces that are special to your local community which should be designated? If yes, please provide details of the open space, its location and the reason why it is special to you and your community.

Eccleshall PC are in favour of protecting local green spaces and have already made provision for this within the Parish.

Question 18

What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?

School growth needs to be considered proactively in line with potential housing developments, before approval of planning applications, to ensure junior provision remains local to home.

It is unlikely the primary school in Eccleshall can expand to meet further demands, so this needs to be considered ahead of any future large developments.

Question 19

19a What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?

- 24 hour accident and emergency provision at County Hospital, and well supported ambulance services.
- Improved provision of bus services in rural areas
- Car parking
- Increased capacity for GP surgeries/increase in opening hours.

19 b) Where should these be located/go?

Any large scale developments such as the proposed garden village should have to provide all necessary facilities within the site at their own cost.

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

Eccleshall PC is an advocated of rural transport networks and with the funding cuts from central government these services are diminishing.

Question 22

Any there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

Eccleshall has the Eccleshall Voluntary Car scheme, which has recently started to operate within the Parish. Run by volunteers, and with a network of DBS checked volunteer drivers, the scheme is aimed at local residents who do not have access to public transport or a car. The passenger pays a set fee based on mileage to the driver.

Types of journeys are expected to be to GP and hospital appointments, collecting prescriptions, shopping trips, social trips to friends, library visits and short journeys up to 20 miles. Users 'join the club' to register their details and it is hoped bookings will be made a week or so in advance to allow time to co-ordinate available drivers.

Question 23

What economic development opportunities do you consider could arise from HS2 for the Borough?

- Increased employment opportunities during the construction phase
- Potential for permanent employment at the railhead site
- Improved highways around Yarnfield and the potential for a new M6 junction near to the Railhead would support economic development.
- Direct links to HS2 at Stafford station will be beneficial to the Borough in many ways, may encourage commuter settlement and support the idea of the development around the station area.

Question 24

Are there any specific transportation projects that the Council should be promoted in the Local Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.

See question 22.

Question 25

National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally.

Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

Yes – the Borough should take a strong lead from guidance provided by the local design panel, to ensure the correct design of houses within settlements which have a strong design identity, such as Eccleshall.

Question 26

What could the Plan do to protect and enhance the Borough's Heritage Assets?

All proposed changes to Heritage Assets should be properly assessed to allow for sympathetic regeneration that retains key characteristics but also allows for assets to be repurposed if the alternative was to fall into a state of disrepair.

Question 27

What approach should the Local Plan take to ensure that Borough's landscape, Area of Outstanding Natural Beauty and its key features are protected and enhanced?

They should continue to be protected.

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

The new Local Plan should continue in line with current SBC policies.

Any proposed development close to these sites could be subject to a contribution towards the enhancement of such sites.

Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

No – there is an effective policy in place.

Question 30

Which renewable technologies do you think are most suitable for development in the Borough?
Please provide additional information as to why you deem these to be suitable.

John mentions solar, which may not be unsightly if properly planned, and all new buildings including houses should have some solar panels included.

Question 31

This document sets out the issues that need to be addressed through the new Local Plan. There may be matters that have been missed or that are not covered by the other consultation questions. Are there any matters you think also need to be considered at this stage and why?

Thank you for your response on the New Local Plan

From: [REDACTED]
Sent: 06 September 2018 22:45
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Falmouth Avenue common land

Dear Sir

I am writing in support of the application to register the common land off Falmouth Avenue in Baswich, as local green space.

I moved into this area, from the north of Stafford, almost 2 years ago and the main reason for choosing this house was the common land. To have nature so close and the beautiful views and sounds, is idyllic. Having moved here from living on a busy main road, Stone Road, I realise how much it affects health and well-being. I used to take inhalers and have asthma and hayfever. I now have no symptoms or medication and I am sure the lack of traffic and fresh country air from the common land has contributed to this.

A few days every week, I work from home, in a room with views towards the land. At all times of the day, almost every time I look over to the fields, there is someone there, whether it be joggers, dog-walkers, children playing, cyclists, families pushing prams or just people going for a walk. It is a very sociable area, for example there is the daily 10.30 meet up of dog-walkers by the big tree. It is rare to see no one there. If the fields were gone, it would affect a great many people.

We as a family use the land very regularly, at least a couple of times a week, to cycle or walk. It can be just a flat easy walk or taking the very steep hills, it is very good fitness training. Also it is easy access to the canal towpaths for a longer walk or run.

There is so much nature there too, so many varieties of birds and, early in the morning or dusk, you can see the rabbits.

We love it as an easily-accessible area of peace and tranquillity and countryside in a busy town of traffic and noise and people. Please register this as local green space

Regards
Heather Jewell

[REDACTED]

From: [REDACTED]
Sent: 07 September 2018 12:25
To: forwardplanningconsultations
Subject: Local green space - land off Falmouth Avenue Stafford

Dear Sir/Madam

I would like to request that the green space off Falmouth Avenue, Stafford is preserved as such for the continued use of local residents and the wider community alike

This is an area where people can walk themselves, their dogs, children can play and you can sit to observe birds and wildlife or just enjoy the peace and quiet away from traffic and other noise pollutants

This is an area where my children played with friends and now take my grandchildren to play, walk the dog and went sledging in winter

Please say NO to building on this land so that we can all continue to enjoy its beauty

S Raftery

From: Kim Raftery [REDACTED]
Sent: 07 September 2018 14:58
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Land Off Falmouth Avenue
Attachments: Protected Green Space - Land Off Falmouth Avenue.docx

Please consider the attached request.

Regards
K Raftery & M Johnson

K Raftery & M Johnson

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

SUPPORT OF PROTECTED GREEN SPACE – LAND OFF FALMOUTH AVENUE

We would like to re-register our support for the request for the land off Falmouth Avenue to be designated as Local Green Space since our last letter in 2015.

This green space is close to the community it serves and is used several times a day by many local people for dog walking, exercising, play, sledging, family picnics and often as space to get some relaxation time after the strains of the day. The area is such a beautiful place and should be recognised as such. It is important that such key space is kept to maintain areas where families can exercise, learn and relax together – away from televisions, radios, internet, pollution from traffic and noise - enjoying some quality, uninterrupted time together without having to get in the car (which is often needed when visiting Cannock Chase). The area is also rich in wildlife and fruit-growing trees and bushes – often the children get to watch birds and rabbits in their natural environment and learn about them in situ.

One of us has lived locally for 35 years and the other for 10 years – however, we have both been using the land for much of our lives when growing up, playing as children with friends – and now enjoying it as outlined above with family, friends and pets. The land off Falmouth Avenue is so important to us that it became essential criteria to remain living locally to it for our recent house search.

Please consider and support this request.

Yours sincerely

K Raftery and M Johnson

From: jan reeves [REDACTED]
Sent: 08 September 2018 12:18
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Local green space - Falmouth Avenue

Hello Stafford Borough Council

I am emailing in support of the Falmouth Action Group who have applied for the green space off Falmouth Avenue to be registered as Local Green Space.

I walk my dog on this area of land once or twice every day and also use it when walking or cycling into town, onto Cannock Chase or to get anywhere else in the surrounding area. Many others use it for the same reasons and it is highly unusual to be on 'the fields' and not see anybody else.

I have made several friends who I've met whilst walking my dog on the fields, which has led to us going to social events together, looking after or walking each others dogs as a favour or has just given us an opportunity to meet up, walk and chat and 'put the world to right'. Without this meeting area, morning walkies would not be as much fun for me and my dog, and I know we would both really miss meeting and socialising with fellow dog owners and their dogs.

I hope the council sees sense and takes into account the wishes of the local population who just want a small area in which to exercise, dog walk, take in the fresh air in a quiet rural(ish) setting, socialise and enjoy.

Kind Regards,

Mrs Janet Reeves
[REDACTED]

From: Dave Banham [REDACTED]
Sent: 08 September 2018 21:34
To: forwardplanningconsultations
Subject: Comments on "Scoping the Issues Report July 2018"

Here are some comments to some of the questions posed by the document "New Local Plan: Scoping the Issues Report (July 2018)". I hope this provides a useful input to your process.

Best regards

Dave Banham

[REDACTED]

[REDACTED]

Qu 2: The Borough needs to leverage its North & South transport connections and make significant improvement to its East & West transport connections.
(Particularly to the East with the A50 connection to Derby & Nottingham.)

The town itself, needs to provide a good mix of leisure facilities for all age groups, combined with the basic amenities of grocery and clothing retail, schools, GP practices, and a hospital that is fit for purpose for the size of the town's population.

Qu 4: Better transport links, which is predicated on having better (wider) roads.

Qu 5: Yes; housing estates with high densities just create over crowding problems and exacerbate social decay in the long run. It also creates problems for the increasing level of car ownership since there is insufficient space for a household to keep all of its vehicles off the road.

Qu 7: The demographic trend is for an increasing elderly population. Building houses that older people can "down size" into will free up family size homes.
Typically what most older people will aspire too is a bungalow (and not apartments/flats). Hence the plan should seek to increase the percentage of bungalow properties in the town.

Qu 10: the town's road network is no longer fit for purpose - See answer to Qu 24.

Qu 11: The town needs to attract high value employment across a range of activities and get away from consuming large plots of land with low value employment, such as warehousing. The town has a significant engineering heritage, which is now on the wane and needs to be reversed at least in the more general sense of the "knowledge economy". As it is, a significant percentage of the towns working population must be commuted elsewhere for their employment.

Qu 16: Sporting and Leisure facilities need to be developed in line with the growing population to meet the increasing demand.

Qu 18: Educational facilities need to be developed in line with the growing population to meet the increasing demand. (For example the Kingston Centre on Fairway could be changed back into a school (possibly a super primary) to serve increasing population in the area.)

Qu 19: see answer to qu 2.

Qu 21: Firstly, it is fallacy to consider that private vehicle usage can be reduced in the time scale of this local plan, and even beyond that. Vehicle ownership is increasing as the populations affluence increases; just look at the number of cars parked outside the majority of houses.

Secondly, local public transport services could be improved. Over the last decade there has been a steady decline in the level of provision of local public transport (i.e. buses) and this needs to be reversed. Public transport also needs to be more sustainable (to eliminate dirty diesel exhausts) and this should be applied to both buses, taxis and private hire cabs.

Qu 23: All HS2 will do is add the town to the list of commuter towns that can service London. When HS2 connects with the Northern Power house cities then we may see a swing in economic activity, but that will still make Stafford a commuter town. better make sure that the HS2 station has a large car park!

Qu 24: The town's road infrastructure is already struggling at peak times on a week day and weekends and the slightest exacerbation to the network from road works, shut roads, accidents, or problems with M6 result in very significant amounts of congestion and stationary vehicles are wasting energy and creating unnecessary pollution (directly or indirectly) as a result. The town's road network is fundamentally flawed, having been designed for small market town in the days where vehicle ownership was modest. Now with vehicle ownership per household being relatively high, and combined with commercial traffic, the town's growing population has out grown the town's road network capacity. Thus, in order for the town to prosper, it needs new roads to spread/disburse the traffic load and certainly lower the volume approaching the gyratory.

Qu 30: New build housing should incorporate grey water systems.

From: Dave Banham [REDACTED]
Sent: 12 September 2018 21:33
To: forwardplanningconsultations
Subject: Re: Comments on "Scoping the Issues Report July 2018"

Further to my previous email on this subject, I would like to add a few additional points that have come to mind.

Addendum to Qu30: New housing needs to have a better (lower cost, easier to handle by the household and refuse contractors, and not be unsightly) refuse system for all categories of waste. The multiple wheely bin system is less than ideal. (Especially for pre-existing housing stock with no space to keep the bins.) Designing-in community bins, serving many house-holds, to new estates may provide a better solution for bulk storage awaiting collection than requiring each household to manage multiple wheely bins. (My house has 4 such bins; 2x recycling, 1x general, 1x garden).

And, as I can't find a better place to make the following two points, I'll also add them to QU 30 as well:

The transition to bright white street lighting over the last decade needs to be reviewed. Recent studies have shown that the blue light content of this white light is causing harm to both animals and people. Moreover, the blue light content resets the eye's dark adaptation in an instant and this causes problems when moving from a well lit "light pools" to areas only served by scattered light. (You can note the difference in light level perception when walking (or driving) around estates illuminated in white light and those illuminated by low pressure sodium light with its predominant red light content.) Note that LED lighting can be made with pretty much any spectral content and does not just have to have a broad-band, white light, output.

In support of electric cars, new housing should incorporate fast charging technology. A consequence of this is that a 3-phase electrical supply will be needed for each property and the new estates electrical supply network needs to be capable of fast charging an estates worth of cars simultaneously (or having the means to coordinate the charge connection points to stagger their demand to meet a target time for the connected car to be ready for its next intended use (such as in an overnight charging scenario)). The means of providing such car charging facilities retrospectively to the existing housing stock, and especially to those areas that only have on-road car parking, also needs consideration.

Consider how on-road parked cars will be charged with trailing cables from the owners property to their car that may not even be parked directly outside their property. [Consideration should also be given as to whether hydrogen power cars will succeed, since it avoids the electrical infrastructure issues noted here and replaces that with the need for hydrogen filling stations.]

Hope this helps.

Regards

Dave banham

From: Clare Eggington
Sent: 10 September 2018 10:38
To: forwardplanningconsultations
Subject: Local Plan consultation response of Cannock Chase Council

Thank you for consulting Cannock Chase Council on the first stage of the Local Plan Review, ie the Scoping the Issues Report. This email is the response of Cannock Chase Council to the consultation on this document.

Our Councils meet regularly on a range of planning policy matters under the Duty to Co-operate. From the most recent meeting (held on 23rd July 2018) it was agreed that our existing evidence shows that Stafford Borough and Cannock Chase District have different housing market areas and economic geographies, and work together primarily on environmental matters in particular the Cannock Chase Area of Outstanding Natural Beauty and the Cannock Chase Special Area of Conservation (SAC) and their associated partnerships and shared evidence base and shared approach to mitigation and cumulative impacts where this is required by the Habitats Regulations.

There are a number of areas in the consultation document which will need updating as the consultation was launched prior to the Government publishing the new National Planning Policy Framework, so clearly work on the next stage of the plan will need to have regard to this. Cannock Chase Council welcomes the brownfield first approach and will need to follow the approach set out in the new NPPF should it be unable to accommodate all of its growth requirements on brownfield sites, to ensure that it can achieve its growth ambitions within its own boundaries and without negatively impacting upon environmentally sensitive areas such as the AONB and SAC. Furthermore, once more information is available it will be essential that infrastructure is carefully planned for, this includes transport matters. As such, infrastructure provision, funding and delivery will need to be considered within a wider strategic context under the Duty to Co-operate.

Given that national planning policy is currently undergoing great change, and that further information is not yet available at the local level, it is important that our two Councils keep a regular and constructive dialogue going, as we both update our evidence and move forward to shape the next iterations of our Local Plans.

If you wish to discuss anything further at this point please let me know

Kind regards

Clare



Clare Eggington | Planning Policy Manager



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Dear [REDACTED]

I am writing on behalf of our group to ask whether representatives could meet with you to discuss to what extent, and how, local authority house-building policies and practices can fully address the scale of the ecological crisis which we currently face.

- As you will know, we see the consequences of accelerating anthropogenic **global warming** as increasingly catastrophic, and we think that all of us – including national government, local authorities, builders and house-dwellers – should make our first priority the protection of our planet home from further warming.
- The same applies to other dimensions of the ecological crisis, including rapid **biodiversity loss**, which is an equal threat to the wellbeing of all living things, including our own species. A key example is the catastrophic decline in bee populations in recent years.
- We feel that in one sense, all new **house-building** is of itself **unsustainable**. It requires huge investments of energy and materials, and obliterates acre after acre of living soil, along with the wider ecosystems of which the soil forms a crucial part. The main emphasis should be on transforming our lifestyles and making full use of existing housing stock, a substantial proportion of which is at any one time unused.
- If we are however driven to allow some house-building, **standards** should clearly reflect the size of the ecological problems we face. The same applies to the building of supporting infrastructure such as **transport** links and **leisure** facilities. The use of brownfield sites should be top priority. Affordable housing on smaller plots should be given precedence over executive houses which use up so much more land and other resources.

We would very much like to discuss what a local authority such as Stafford Borough Council can and should be doing on each of these four points. Some specific issues might be:

- a. **Alternatives to new build** What can planners do to make the best possible use of existing housing stock and to incorporate sustainability measures when non-residential buildings are converted into homes?
- b. **Energy conservation and renewables**
 - i. What targets for the **reduction of greenhouse emissions** does SBC have, and how rigorously are they pursued? Can zero carbon emissions be the ultimate target?
 - ii. Why are the highest standards not universally applied? The Bovis

development at St Mary's Gate, for example, has only been given a 'B' **energy rating**, and the Church View development, built by Redrow, only received a 'C'.

- iii. The first tenet of '**passive**' standard design is appropriate site orientation, but in none of the three developments on the Tixall Road which we have seen has this been addressed: the houses are not oriented to make the best use of the path of the sun. There is, similarly, no attempt to design '**active**' houses, for example ones with heat exchangers and the capacity to use renewables to generate electricity.

c. **Transport**

- i. What scope do you have to provide **alternatives to car use** and how determined are you to do so?
- ii. The assumption of planners and developers seems to be that **the car still rules**, whatever their paper commitment to such environmental imperatives as reducing greenhouse gas emissions and protecting biodiversity. The by-pass alongside the Tixall Road developments is a case in point.

d. **Leisure**

- i. What scope does a local authority have to ensure that new developments incorporate **significant leisure facilities** which contribute to the necessary reductions in traffic and carbon emissions?
- ii. Stafford has been losing **spaces for public recreation** over many decades – tennis courts, crown bowling greens, football and cricket grounds, and more.
- iii. Gardens, allotments and public green spaces are essential to the **local production of food** on the scale which is needed.
- iv. **Community centres** built into new developments are another ingredient of the process of localising the provision of goods and services which is at the heart of sustainability.

e. **Biodiversity**

- i. What can Stafford Borough Council do to inspire and enforce much greater commitment by developers to the **protection and enhancement of biodiversity**?
- ii. A well-established and richly-varied **hedgerow**, for example, (containing perhaps most notably guelder rose) alongside the David Wilson Homes and Bovis developments at St Mary's Gate on the northern side of the Tixall Road was ripped out, making nonsense of claims that protection of biodiversity is a priority. Indeed, Bovis offers buyers a green wash 'Ecology information' leaflet which makes the ironic claim that bats, badgers, and birds (such as a little owl and lapwings) might be seen on site, at the same time as pointing out that for each group hedgerows (!) are a key source of food.

We hope that you will feel that a meeting would help us to grapple with the realities of your role on the one hand and the scope for going beyond national regulations and requirements on the other.

Sincerely
 Roger Oldfield
 Correspondent
 Sustainability Matters in Stafford Borough

From: CHARLES BEARDMORE [REDACTED]
Sent: 11 September 2018 19:30
To: forwardplanningconsultations
Subject: The New Local Plan

[REDACTED]

The following email is in response to stage 1 of the new Local Plan scope consultation.

The current plan for Stafford Borough between 2011-2031 states 70% of new development will be within or on the fringes of Stafford town. This approach I feel is inadequate, primarily due to the lack of transport infrastructure to cope with the increased demand. If these none linear developments were spread more evenly across small to medium size satellite villages with excellent transport links, it would not only alleviate some congestion within Stafford Town, it would also breathe new life into villages with aging populations. Two prime examples of the traffic issues due to the new developments within Stafford are along Beaconside and Blackheath Lane, both of these areas have shown a dramatic increase in congestion since the creation of, Marston Grange, St Mary's Gate and Church View. Both of these areas are close to recently constructed business developments, further traffic issues has the potential to deter new companies setting up within Stafford.

I am strongly for the redevelopment of Brownfield sites within Stafford but the redistribution of fringe development across the small to medium size villages would have a greater positive impact on the local communities with introduction of new facilities and people which they desperately need. In addition to this, the village developments would free up more first time buyers houses as 2nd/ 3rd time established buyers would be drawn to the countryside.

Thank you for time reading my opinions on the Stafford Borough local plan.

Regards

Charles Beardmore

[REDACTED] - Forward Planning
Stafford Borough Council
Civic Centre Riverside
Stafford
Staffordshire
ST16 3AQ

Our ref: UT/2006/000313/CS-
15/IS1-L01
Your ref:
Date: 12 September 2018

Dear [REDACTED]

STAFFORD BOROUGH COUNCIL NEW LOCAL PLAN

SCOPING THE ISSUES REPORT (JULY 2018)

Thank you for referring the above consultation which was received on 18 July 2018.

The Environment Agency has the following comments to make regarding issues relating to the water environment that need to be addressed within your Local Plan Review.

Water Framework Directive

A large part of the Environment Agency's work now is to implement the Water Framework Directive (WFD), a European Directive which aims to protect and improve the water environment. It applies to surface waters and groundwater.

Successful implementation of the Water Framework Directive will help to protect all elements of the water cycle and enhance the quality of our groundwaters, rivers, lakes, estuaries and seas. We would expect therefore for WFD to be integrated into your Local Plan, and reflected in many of the policies your draft which relate to flooding, drainage, rivers, ecology and contaminated land.

The Water Framework Directive (WFD) looks at the ecological health of surface water bodies (defined as a slight variation from undisturbed natural conditions), as well as achieving traditional chemical standards. In particular it will help deal with diffuse pollution which remains a big issue after we have improved most point source discharges.

The Environment Agency has published River Basin Management Plans (RBMPs) that identify measures that will achieve WFD requirements for all water bodies in England and Wales. Regulation 17 of the Water Environment (WFD)(England & Wales) Regulations 2003 places a duty on

[REDACTED]
Cont/d..

each public body including local planning authorities to *'have regard to'* RBMPs.

When undertaking the development of a site, or the proposed development of a site, an assessment should be made to:

- identify when there might be impacts on water bodies;
- seek options that reduce impacts on water bodies;
- assess the risk of deterioration or failing to improve water bodies;
- require all practicable mitigation;
- prevent deterioration of current water body status;
- take listed measures in RBMPs into account;
- consider alternative development options that would avoid or reduce impacts on water bodies;
- seek opportunities to improve water bodies; and
- consider objectives in RBMPs for protected areas.

We recommend the following guidance, which provides advice on how Local Authorities can fulfill their duties in implementing this directive. Please pass on to any other colleagues you feel may benefit from this (including those outside planning). A list is included within the document stating which LPA roles may have a role to play with regards to this.

[http://www.sustainabilitywestmidlands.org.uk//media/resources/Final Executive Summary June 2012.pdf](http://www.sustainabilitywestmidlands.org.uk//media/resources/Final_Executive_Summary_June_2012.pdf)

The RBMP most relevant to your Authority boundary is the Humber River Basin Management Plan which can be found here:
<https://www.gov.uk/government/collections/river-basin-management-plans-2015>

Rural areas to the west of the borough drain to the Severn however, and as such the Severn River Basin Management Plan should also be considered:
<https://www.gov.uk/government/collections/river-basin-management-plans-2015#severn-river-basin-district-rbmp:-2015>

Rural areas in the far north of the borough drain to the north-west, and as such the North-West River Basin Management Plan should also be considered:
<https://www.gov.uk/government/collections/river-basin-management-plans-2015#north-west-river-basin-district-rbmp:-2015>

The following issues all fall under the banner of WFD-implementation in some way and should therefore be addressed within your policies and growth proposals.

Foul Drainage

Evidence supporting your Local Plan Review should demonstrate that the necessary foul drainage infrastructure is in place or viable for your allocated sites. Some areas may drain to the foul main sewer system to be treated by Severn Trent Water, but the transmission infrastructure or treatment facility may not be sufficient to handle the additional load created from growth and may in turn cause a pollution of the water environment.

Conversely, where the main sewer is not available it must be ensured that the water environment has the ability to accommodate discharges from packaged treatment plants and other non-mains solutions.

Where growth will be putting additional pressure on the Severn Trent Water foul mains, it must be demonstrated there will be no significant deterioration in current spill frequency/volume from storm related discharges (CSOs, storm tanks, pumping stations) as a result of any growth. This will require hydraulic modelling from Severn Trent Water (STWL) to demonstrate no risk of deterioration.

The Environment Agency cannot make any statement on whether there is hydraulic capacity within a sewer network to accommodate the additional flow. Only STWL can do this. We can however advise on areas of concern with regards to 'permitted' capacity. In other words, sewage works that currently have headroom in their permits and acceptance of the additional flow would not trigger a permit alteration STWL should therefore be consulted on whether they have a preference for the location of the developments. If there are various parcels of land that could be developed then they may prefer certain areas draining to certain STWs or avoiding known pinch-points within a sewer network.

At the point where we know where the growth is projected and which STWs it will drain to we can carry out a quick assessment to produce a RAG assessment of permitted capacity.

Water Availability

Evidence will also need to be provided to demonstrate that adequate water can be made available to support the level and distribution of growth proposed.

Severn Trent Water are implementing various policies to reduce demand. These should be taken into consideration for any development in the area, especially the Building Regulations &c. (Amendment) Regulations 2015. We therefore recommend that any development considers water resource availability and implements water efficiency measures.

Drought and non-drought events can put customer water supply at risk, these challenges combined with increased levels of development in the area should be considered as part of the whole in the assessment of whether a sustainable supply of water is available to support the plan.

We recommend that in order to undertake the required assessment of these issues and provide suitable evidence to support your plan, the above issues relating to both foul drainage / water quality and water resources are addressed holistically in an integrated Water Cycle Study, which builds upon and updates your current study from 2010.

River Channels

Green/blue corridors provide multiple benefits to residential areas by providing services such as flood management provision, green space and ecological function and some amenity. Consequently they then need to be afforded a high level of protection (8m minimum standoff) from encroaching developments in order to facilitate their function particularly with the need for extra capacity due to climate change. This should be considered when assessing the capacity of sites that have a watercourse within or along the boundary.

Deculverting of watercourses should be a standard policy primarily because it reduces flood risk and creates new ecological habitat. This will also allow more space to be freed up by for development because new development over culverts is not allowed and reduce future management implications of the culvert in the long-term. The new watercourse can be diverted to increase total length around the edge of developments which can provide extra flood event capacity and improve development layout.

If greenspaces can be designed to be less formal areas with more semi-natural habitats this will reduce maintenance costs and provide better biodiversity and water management potential. These can also be incorporated into the surface water management of the site.

Groundwater Protection

Please note these comments relate solely to the protection of 'Controlled Waters', comments on the impact of contaminated land on human health should be directed to your Environmental Health team.

Approximately fifty percent of the area covered by Stafford Borough Council is underlain by geological strata designated as Principle and Secondary Aquifers under the Environment Agency's 'Groundwater Protection: Principles and Practice' document. Several Source Protection Zones have been designated within the borough to protect Public Water Supply groundwater abstractions. Various watercourses cross the borough including the Rivers Trent and Sow.

Groundwater in the underlying Principle and Secondary Aquifers and surface watercourses are 'Controlled Waters' and potential receptors of any land contamination which may be present within the borough. Therefore there is a need to give appropriate consideration to the protection of 'Controlled Waters' receptors during the development process. Such consideration is particularly required in relation to the redevelopment of brownfield sites where past activities may have caused land contamination but is also relevant when considering the future location of potentially polluting activities (e.g. the storage of fuels, oils and chemicals).

We note that Section 3.11 (Prioritising Brownfield Land) refers to over 160 brownfield sites that have been put forward within the Local Plan area for potential development. To address any issues associated with the redevelopment of brownfield sites, suitable site investigation and risk assessment will need to be undertaken in relation to 'Controlled Waters' receptors as recommended in planning policy guidance. Normally, this risk can managed at planning application stage, however you should be aware when allocating sites that the degree of underlying contamination (and associated cost of remediation) may be a factor in the deliverability of allocated sites and as such it may be prudent in some cases to consider undertaking assessment of these risk at the strategic stage.

Government Policy, as detailed in the National Planning Policy Framework (paragraph 120), states that *'where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner'*.

The plan proposals should be in line with the position statements in our 'Groundwater Protection: Principles and Practice' (GP3) document, available from our website at www.environment-agency.gov.uk. This document sets out our position on a wide range of activities and developments, including:

- Storage of pollutants and hazardous substances

- Solid waste management
- Discharge of liquid effluents into the ground (including site drainage)
- Management of groundwater resources
- Land contamination
- Ground source heat pumps

It should be noted that certain high risk activities (e.g. underground and sub-water table storage of fuel) may not be appropriate within high risk areas such as Source Protection Zones.

Flood Risk

Flood risk is a key local issue as well as a cross-boundary issue and as such should be addressed by the inclusion of a specific flood risk policy to cover all sources of flooding, in addition to an up to date Level 1 Strategic Flood Risk Assessment (SFRA) and Level 2 SFRA where sites are allocated within the mapped floodplain to demonstrate that the site proposals can be delivered safely. Site allocations at risk of flooding should be supported by evidence to demonstrate that the Sequential Test and Exception Test have been passed. We recommend that funds are set aside at this early stage to commission consultants to undertake a detailed Level 2 SFRA if necessary.

The Stafford BC area covers the River Trent and River Sow as well as a number of their tributaries which are all Main Rivers including Sandyford Brook, Rising Brook, Scotch Brook, Meece Brook, Doley Brook, and the River Penk. The main urban areas are at risk of flooding from rivers.

There are currently around 1,700 residential and 1,120 non-residential properties at risk of flooding from rivers in the Stafford BC area with considerably more at risk from surface water flooding. This risk is likely to increase as a result of climate change. Parts of Stafford and communities along the River Trent are covered by the Environment Agency's flood warning service.

Surface Water

The Stafford Borough area has historically experienced a high number of flooding incidents caused by surface water. Staffordshire County Council, as Lead Local Flood Authority, should be consulted regarding surface water issues and suitable measures to deal with surface water arising from development proposals required to minimise the impact to and from new development. Staffordshire County Council has also published a SuDS Handbook which includes their requirements for managing surface water on new developments: <https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Information-for-Planners-and-Developers.aspx>

Sow & Penk Internal Drainage Board (IDB) provide flood protection and water level management in the low lying areas of the River Sow and River Penk catchments in Staffordshire, Wolverhampton and Shropshire including a large area through Stafford itself. Although the IDB is not a statutory consultee on planning matters, developers are encouraged to contact them if their site falls within their boundary. Any works in, under, or near watercourses, or discharges of water into watercourses in the IDB area is likely to require consent from the IDB as well as planning permission.

Flood Defences

There are Environment Agency maintained flood defences in Stafford (River Sow, Sandyford Brook and Rising Brook), and at Aston Chase (Aston-by-Stone), Yarnfield and Standon. There are also flood storage areas at Aston Chase and Yarnfield.

In order to ensure that the appropriate level of protection these defences provide is maintained in future, we need to ensure we can safely access these areas in order to inspect and carry out works. It is therefore important that any proposed development is set back at least 8 metres from any flood defence for this purpose. Consideration should be given to using CIL charging to contribute towards the costs of maintaining these defences for any new development that will benefit from the presence of the defences.

It should be noted that even in defended areas there will always still be a degree of residual risk if these defences are overtopped or breached by a flood event greater than that for which the defences were designed. For this reason proposed development in areas benefitting from the presence of the defences will be required to incorporate raised floor levels.

Investment programme

There are a number of proposed schemes in our investment programme within the Stafford BC area which are all at different stages of assessment, appraisal and construction. Scheme costs and the amount of grant that schemes are eligible for can vary as they are developed. All proposed schemes are subject to economic and environmental viability and to the availability of funding. A number of these schemes are unlikely to proceed unless contributions from beneficiaries or partner organisations can be identified and agreed.

Please see Appendix 1 for details of schemes currently within our flood investment programme, and financial contributions required to bring these forward.

Other flooding problems may arise in future which will require flood alleviation measures subject to technical, economic and environmental viability. Consideration should be given to using CIL charging to secure funding for flood risk schemes that are unlikely to be wholly funded through central or local government.

Strategic Flood Risk Assessment

The SFRA was originally produced in 2008 by Stafford Borough Council and was subsequently updated in 2014. Since then we have completed further hydraulic modelling at Stone, including Aston Chase and at Eccleshall (River Sow).

Environment Agency has updated their guidance on how climate change could affect flood risk to new developments which was published on 19th February 2016 and came into immediate effect and these new climate change allowances should be used. More information can be found at the following link - <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

The existing SFRA does not take account of the revised climate change guidance issued in 2016 as it has used an increase of 20% in peak flows to determine future flood risk. Given the strategic nature of Level 1 SFRAs, we would now expect LPAs to consider as a minimum, the potential impacts from climate change under the central (20%), higher central (30%) and upper end (50%) allowances for the 2080s epoch to be included as part of the evidence base for the revised plan.

In addition, other relevant documents published since 2014 such as the following should be taken into consideration as part of any SFRA review:

- Staffordshire Local Flood Risk Management Strategy 2015
<https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/Local-Flood-Risk-Management-Strategy.aspx>
- Staffordshire SuDS Handbook 2017

<https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/SuDS-Handbook.pdf>

- Humber Flood Risk Management Plan 2016 [Sub Area 'Staffordshire Trent Valley']
<https://www.gov.uk/government/publications/humber-river-basin-district-flood-risk-management-plan>

The SFRA (Level 1) should be used to **apply the Sequential Test** and assess all proposed site allocations to determine whether they are located outside of flood risk areas from all sources of flooding without the application of the Exception Test. It should **include the definition of Flood Zone 3b** to establish areas where water needs to flood or be stored in times of flood. The area identified as functional floodplain should take into account the effects of defences and other flood risk management infrastructure. If an area is intended to flood, e.g. an upstream flood storage area designed to protect communities further downstream, then this should be safeguarded from development and identified as functional floodplain, even though it might not flood very often.

Appropriate policies should be included in the plan to ensure these areas are safeguarded for this purpose.

If the Level 1 SFRA shows that land outside flood risk areas cannot accommodate all the required development, a Level 2 SFRA will be required in order to **provide the information necessary for application of the Exception Test** for those sites. This should include an assessment of the extent, duration, velocity, depth and rate of onset of flooding, as well as identification of affected properties, infrastructure and communities. It should also assess the risk of flood defences failing, for example could defences be breached or overtopped. The likelihood of flood defences failing will change over time, for example because of limitations on maintenance funding and/or degradation. You should also consider what would happen if the flood defences failed.

We therefore advise that the SFRA (Level 1) should be updated to incorporate the latest climate change guidance as well as any other relevant issues and be used to apply the Sequential Test for proposed site allocations. It should also identify any cross-boundary flood risk.

A SFRA (Level 2) will need to be produced to support application of the Exception Test where required, and demonstrate deliverability of the plan proposals.

The conclusions of the SFRA Levels 1 and 2 should be reflected in the revised local plan.

The current SFRA (2014) advises that a policy for flood risk management is essential in order to ensure a consistent approach and ensure that the objectives of national policy are embedded within the local plan. It also includes a number of policy recommendations for integration into the Local Plan.

We recommended that the revised plan includes a specific policy on flood risk. Appendices 2 and 3 provides further details on this issues this should look to address.

Regulated Sites

The general issue of safeguarding regulated activity (such as AD plants, landfill, composting and other waste processing facilities) from proposed new sensitive receptors using a buffer zone is becoming an increasing concern. Issues can involve both housing development increasingly close to an operating waste facility, with inevitable complaints over amenity, with pressure on the Environment Agency (as the Cont/d..

regulatory body) to act. This can result in pressure to demand that a facility closes and relocates, however a facility may be providing local or even national waste management capacity, identified in adopted waste plans.

'Safeguarding' can also refer specifically to providing for appropriate future expansion of existing infrastructure, by preventing conflicting developments. We are seeing increasing pressure on waste facilities especially in urban areas, largely due to housing developments which result in an increase in complaints to ourselves as the regulator of those facilities. Changes to planning system now allow commercial properties to be converted to residential use, such as offices on industrial estates.

It should be made clear that the Environmental Permitting Regulation does not demand 'zero impact', so conflict situations become inevitable.

The updated NPPF now makes reference to placing obligations onto the "Agent of Change" (i.e. the developers/applicants,) requiring them to ensure appropriate mitigations are put in place to protect neighbouring users from impacts:

182. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

As such, the Local Plan should look to identify issues where this may be an issue and consider carefully the allocation of sites which are located within close proximity to permitted waste facilities. Failure to do so can result in unacceptable levels of noise, odour, vibration, dust, smoke, flies, etc. Your local plan policies should identify these high risk facilities, steer development away from such areas and ensure that if development is proposed in close proximity it is such that it is not of a 'sensitive' nature to such nuisances. Close liaison with the waste planning authority and the Environment Agency should be maintained to ensure the plan reflects joined-up working.

Waste

Your plan should show how you have worked constructively alongside the Waste Planning Authority (WPA) to ensure waste management is considered alongside other spatial planning objectives. The timing and phasing of development should be synchronised with the delivery of appropriately located modern and sustainable waste management infrastructure that meets the needs of the local community. Opportunities to integrate waste management into proposed new development should be considered.

Services provided should encourage and enable communities to follow the waste hierarchy – reduce, re-use, recycle, recover, with landfill as the last resort. Waste minimisation and resource efficiency should be at the heart of all new development. The design of buildings and supporting infrastructure should consider their future repair and eventual demolition in the selection of construction mechanisms and materials ('cradle-to-cradle' design).

Climate Change

Climate Change is a key matter which impacts on a number of different topics and is also a significant issue in its own right. In light of this, your plan should ensure it supports and encourages both limiting and adapting to climate change.

Should you have any queries regarding the above comments please contact me on the details below for further advice or to arrange a meeting to discuss.

Yours sincerely

Miss Jane Field
Planning Specialist



Appendices:

<i>Appendix 1</i>	<i>Flood Investment Programme</i>
<i>Appendix 2</i>	<i>Flood Risk Policy Checklist</i>
<i>Appendix 3</i>	<i>Flood Risk Policy Guidance</i>

Appendix 1 – Flood Investment Programme

- Sandyford Brook, Stafford – lowering watercourse bed level and raising flood walls (anticipated timescales 2022/2023 subject to viability and funding). This will provide better protection for approx. 45 homes. Funding will be from Grant in Aid and **further contributions required**.
- Rising Brook, Stafford - Investigate options for reducing flood risk. Design and construct preferred option (anticipated timescales 2026/2027 subject to viability and funding). This will provide better protection for approx. 36 homes. Funding will be from Grant in Aid and **further contributions required**.
- River Sow, Stafford - Upgrade or replacement of existing flood defences. (anticipated timescales 2026/2027 subject to viability and funding). This will provide better protection for approx. 16 homes. Funding will be from Grant in Aid and **further contributions required**.
- Weston - Installation of property level resilience measures. (anticipated timescales 2025/2026 subject to viability and funding). This will provide better protection for approx. 22 homes. Funding will be from Grant in Aid.
- Scotch Brook, Stone - Improve conveyance by introducing silt traps and natural flood management measures (anticipated timescales 2023/2024 subject to viability and funding). This will provide better protection for approx. 150 homes. Funding will be from Grant in Aid.

The following projects are to be led by Staffordshire County Council as the Lead Local Flood Authority:

- Filly Brook, Stone - Partnership project with SCC, Staffs Wildlife Trust and HS2. Improvement works to Filly Brook upper catchment to provide environmental benefits whilst decreasing flood risk. (anticipated timescales 2021/2022 subject to viability and funding). This will provide better protection for approx. 13 homes. Funding will be from Grant in Aid.
- High Speed 2 / Shugborough - Partnership project with SCC, EA, National Trust & Staffordshire Wildlife Trust. Restoration of water meadows and planting to provide wider habitat and flood risk benefits. (anticipated timescale 2022 subject to viability and funding). This will provide better protection for approx. 5 homes. Funding will be from Grant in Aid.

Sandyford Brook, Stafford has a long history of regular flooding in the Sandon Road area due both the brook overtopping and rainfall when the high water levels in the brook prevent surface water drains discharging. The brook is highly constrained by walls and culverts leaving no space for flood flows. This is exacerbated by the bed levels of the brook falling against the direction of flow at the southern end which raises water levels upstream and increases flood risk.

A number of solutions have been investigated over recent years. It has now been established that a proposed flood storage area upstream in the north of Stafford would not reduce flood levels further downstream as much as had been anticipated and would therefore not be feasible. Further work has concluded that raising walls along part of the brook, along with regrading the bed level between Sandon Road and Crooked Bridge Road, would reduce flood risk from the Rising Brook. A proposed scheme to improve the standard of protection along Sandyford Brook is in our investment programme and is currently planned to commence in 2022. However there is a significant **funding gap of around £1 million** which will need to be met through developer and/or partner contributions before the scheme can proceed. We recommend the inclusion of a policy that states that any development that would benefit from the proposed scheme be required to make a contribution towards the proposed scheme.

Rising Brook, Stafford - Homes are at risk of flooding risk from Rising Brook at Stafford as a result of the brook overtopping between the M6 and the culvert beneath the railway line near Kingsley Close. To the east of the railway line Rising Brook is heavily influenced by the River Penk and when the River Penk levels are high further properties have historically been at risk of flooding.

The Rising Brook Flood Alleviation Scheme constructed in 2004 provides protection to properties on Sherwood Avenue and Richmond Close to approx. the 5% (1 in 20 years) probability. However recent flood hazard mapping shows that the area affected by flooding is still at risk in a 5% event.

An initial study has concluded that storing water upstream of the M6 would make little difference to flood risk in the area. Other options are being investigated and a proposed scheme is in our investment programme which is currently planned to commence in 2026. However, there is a significant **funding gap of over £2 million** which will need to be met through developer and/or partner contributions before the scheme can proceed. We recommend the inclusion of a policy that states that any development that would benefit from the proposed scheme be required to make a contribution towards the proposed scheme.

River Sow, Stafford – A proposed scheme to reduce flood risk by upgrading or replacing existing flood defences, including improving the capacity of an informal flood storage area, is currently planned to commence in 2026. However there is a significant funding gap which will need to be met through developer and/or partner contributions before the scheme can proceed. Preliminary investigation work is ongoing.

Appendix 2 - Flood Risk Policy Checklist

In line with national planning policy any new development should be directed away from those areas at highest flood risk, i.e. towards Flood Zone 1. Planning applications for development within the Plan area must be accompanied by site-specific flood risk assessments in line with the requirements of national planning policy and advice. These should take account of the latest climate change allowances. Consideration should also be given to the impact of new development on both existing and future flood risk. Where appropriate, development should include measures that mitigate and adapt to climate change. In the longer term, consideration should be given to identifying opportunities to remove development from floodplains through land swapping to maximise natural storage of flood water, reduce flooding problems and increase landscape, ecological and conservation value.

It should be further expanded to cover a wider range of relevant flood risk management issues including the following:

New development proposals must also demonstrate that they will not increase flood risk **elsewhere** both in and out of the Plan area.

The sequential approach should also be used within development sites to inform site layout with the most vulnerable part of the development located in the lowest risk areas and the higher risk areas being used for flood risk management, environmental, recreation or amenity purposes.

On greenfield sites surface water runoff rates should not be increased. On brownfield sites surface water runoff should be reduced to the greenfield rate wherever practical. Applicants should target a reduction in surface water discharge in accordance with Defra and LLFA guidance. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage.

All new development, including infill development and small scale development, should incorporate sustainable drainage systems (SuDS) to reduce flood risk and manage surface water and to ensure that runoff does not increase the risk of flooding elsewhere taking account of the impact of climate change. Long-term maintenance arrangements for all SuDS should also be in place for the lifetime of the development and agreed with the relevant risk management authority. Development should ensure that SuDS link to green infrastructure to provide environmental benefits as well as balancing flood flows and improving water quality.

Proposals for new development should consider future flood risk and, where appropriate, include resilience measures that mitigate and adapt to the anticipated impacts of climate change.

All development should be set back from main rivers with a minimum of an 8 metres wide undeveloped buffer strip in order to provide maintenance access, make space for water and provide additional capacity to accommodate climate change.

Existing open watercourses should not be culverted. Building over existing culverts should be avoided. Where feasible, opportunities to open up culverted watercourses should be sought to reduce the associated flood risk and danger of collapse whilst taking advantage of opportunities to enhance biodiversity and green infrastructure.

Where this is not possible, an assessment of its structural integrity should be made, with any remedial actions taken prior to the development of the site. In addition, a maintenance regime should be agreed to reduce the likelihood of blockage.

Where possible, opportunities should be sought to work with other bodies and landowners to encourage and promote implementation of natural flood management measures which will contribute towards delivering a reduction in local and catchment-wide flood risk and the impacts of climate change as well as achieve other wider environmental benefits.

Where possible, opportunities should be sought to undertake river restoration and enhance natural river corridors as part of a development in line with the Water Framework Directive and to make space for water.

River habitats should be retained and enhanced and take opportunities to improve connectivity.

Appendix 3 - Flood Risk Policy Guidance

National planning policy is clear about the approach to be taken by local authorities towards dealing with flooding issues at all stages of the planning process. Development plan policies must take full account of flood risk and develop policies to manage flood risk by applying the sequential test, avoiding inappropriate development in areas at risk of flooding, directing development away from areas at highest risk or where development is necessary, making it safe without increasing flood risk elsewhere. Decisions on land use, including development, should reflect the level of current and future flood risk.

District councils and unitary authorities have key roles in land use planning and working with communities to ensure that development is appropriate for the area in question. This is supported by the Environment Agency as a statutory consultee for flooding and other organisations such as infrastructure and utility providers who provide advice. The Environment Agency also has a regulatory role in permitting works carried out by others in, or adjacent to, watercourses and flood defences to ensure that they have regard to flood risk and do not cause unnecessary environmental damage.

The Environment Agency will work with local authorities and developers to avoid inappropriate building or redevelopment in areas of high flood risk. Key to this is ensuring that risks are effectively identified in local strategies and that there is good **co-operation between the lead local flood authority and the planning authority**. This should ensure that local development plans and other plans include appropriate policies and avoid inappropriate development in areas at risk. Proper consideration should be given to flood risk management issues in managing land use and developing/re-developing areas within a catchment that are not directly at risk, to ensure that risks are not increased in other areas.

1. Flood Risk Overview

1.1 Flooding can have a devastating impact on communities. 5.2 million homes and businesses in England are at risk from flooding. That risk comes from rivers, the sea, rising groundwater and overwhelmed drains and sewers. Some properties are at risk from more than one of these. However, during a significant flood event, we all have the potential to be affected by flooding as local services and utilities are disrupted. Flood risk in England is expected to increase due to climate change and development in areas at risk. Changes in weather patterns and, in particular, more torrential rainfall is likely to increase flood risk from surface water as well as rivers.

1.2 Flooding is a natural process which cannot be prevented entirely, but there are actions that can be taken to manage these risks and reduce the impacts on communities. We need to plan for increasing pressures under a changing climate and a growing population.

1.3 It is not technically, economically or environmentally feasible to prevent flooding altogether. A risk-based management approach targets resources to those areas where they have greatest effect. Risk management measures consider both the probability over time of a flood happening and the consequences that might arise if it did.

2. Government Policy

2.1 Government policy states that flood risk should be managed in a co-ordinated way **within catchments** and balance the needs of communities, the economy and the environment.

2.2 The 25 Year Environment Plan, published in early 2018 sets out the government's ambition to protect and enhance England's natural landscape for now and the long-term. How we manage flood and coastal risk will be a key part of how the plan is implemented. Collaboration between Risk Management Authorities (RMAs)¹ and their partners in managing all sources of flooding and at all spatial scales is essential if we are to achieve this and increase the country's resilience to such pressures.

3. Consequences of Flooding

3.1 Flooding can also cause major disruption to energy, water, communications and transport infrastructure. It can interfere with public services such as schools and hospitals and have significant indirect effects through disruption to travel or loss of income. Such losses can have significant impacts on the local economy outside the area directly affected. Flooding can also have significant impacts on the environment and on cultural heritage, including causing pollution or damage to historic buildings and changes to habitats. However, for some habitats and heritage assets, managed flooding and/or deposits of material eroded from elsewhere are essential for their existence and health.

3.2 It is important that the consequences of flooding are taken into consideration. Risk to life should be of primary importance alongside other factors such as damage to property, business and the economy, infrastructure and the environment, including the historic environment. The numbers of properties in at risk areas may be an indicator of risk to life and property but additional important factors which should be considered include the depth and rate of flow of floodwater, the length of time an area remains flooded and the potential for contamination of the flood water. The depth and rate of flow of floodwater can be particularly important in assessing risk to life as deep, fast flowing floods such as those that may arise from steep, upland rivers or from reservoir failure can present an immediate risk to life. Pressures such as climate change, deterioration in the condition of risk management assets, new development and changes in land use can increase the probability and consequences of flooding.

4. Population Change, Development and Land Management

4.1 Providing for the housing, business and associated needs of an increasing population may increase the consequences of a flood incident. The population of England is predicted to increase considerably, increasing the need to provide homes and infrastructure. Unless this development is carried out appropriately, it could increase risks by placing more people and property in areas at risk. It is therefore essential that spatial planning ensures that new developments take flood risk fully into account, and are safe from, do not increase, and where possible reduce risk over their lifetimes.

4.2 Land management and development can have significant effects on the movement of water within a catchment. Development or changes in land use in areas that themselves may not be at risk of flooding can reduce or prevent rainwater

¹ Risk Management Authorities include: Environment Agency, Lead Local Flood Authorities, District Councils, Internal Drainage Boards, Water Companies and Highway Authorities.

infiltration into the ground, speed up surface water runoff and as a result increase the risk of flooding downstream. This can also apply to rural and agricultural land use where changes in vegetation may cause similar impacts.

4.3 The cost of damages caused when properties are flooded is also likely to increase with inflation and in line with general increases in wealth over time as the value of goods and fittings in households and businesses increases. As a result, even if the likelihood of flooding were to decrease over time, the consequences may still increase as the value of property and contents continues to rise.

5. Catchment Approach

5.1 In understanding and managing flood risks locally, it is essential to consider the impacts on other parts of the catchment. Activities must seek to avoid passing risk on to others within the catchment without prior agreement. This agreement could, potentially, include the provision of funding by upstream communities for actions and measures carried out by others to manage downstream risks. The catchment approach is also key to managing risks at source and achieving wider benefits through more integrated water management and increasing the opportunity for developing new sources of funding as well as pooling resources and expertise.

6. Multiple Benefits

6.1 As well as reducing the risks to people and property, flood risk management can bring significant economic, environmental and social benefits. It can enhance and protect the built, rural and natural environments, cultural heritage and biodiversity by preventing loss and damage to habitats and heritage assets and reducing pollution, for example through the use of Sustainable Drainage Systems (SuDS). It can contribute to regeneration and income generation, protect infrastructure and transport links, and contribute to economic growth.

6.2 To achieve wider environmental objectives and other benefits, the measures used to manage all flood risks (including local sources of flooding) should work with natural processes wherever possible and be based on partnership working with local communities. Working with natural processes can include taking action to manage flood risk by protecting and restoring the natural function of catchments, rivers and floodplains. This could, for example, involve using farmland to store flood water temporarily, reinstating washlands and wetlands to store flood water away from high risk areas or other techniques include protecting and restoring natural river systems and features.

6.3 The management of surface water should be considered early when designing a development to ensure that the best possible drainage system is built. Use of public space and the multifunctional use of open space could be considered as part of preparing local flood risk management strategies to reduce the potential land take from SuDS for new developments. The aim of these measures is to minimise the impacts of development on flood risk and to improve water quality. They will also have other benefits such as to local amenity and biodiversity. New or re-developments should also consider how damages and risk to life from flooding can be avoided through better design and layout

From: LIZ ASHFIELD [REDACTED]
Sent: 13 September 2018 07:41
To: forwardplanningconsultations
Subject: Fw: *Land off Falmouth Avenue
Attachments: [REDACTED]

Please find letter and photos attached that Ms Thompson has asked me to forward on to you.

Thank you,

Liz Ashfield

----- Forwarded Message -----

From: Helen [REDACTED]
To: [REDACTED]
Sent: Monday, September 10, 2018 11:04 PM
Subject: *Land off Falmouth Avenue

Dear Liz,

Please find below a copy of form declaring my usage of Baswich Common/ land off Falmouth Avenue. Also included are some pictures of my family using the common which I give you my GDPR permission to forward along with my form.

- I struggled to get to know people in the area when I moved here but it is only through using the common to walk the dog that I first got to chat to people in the community. It is a sociable place and it has to be beneficial for keeping crime down if you know people in your community.
- It's great for well being and tackling loneliness. It's uplifting to walk across the common. It's an incredibly beautiful space. We are so lucky to have it as part of our community. It is a very special and unique place.
- I teach forest skills to children with disabilities and regular walking on the Common keeps me in touch with what is happening in the seasons in the natural world. Eg the blossom and catkins on the trees, the pollination by bees and seeds/ fruit. Which tree species are turning and dropping leaves first. I could go on and on and on. It gives me lots of ideas for my forest school activities!
- There are a lot of rabbits on the Common and I heard an article on radio 4 talking about how numbers of rabbits have declined recently by something like 90% and they wanted people to report sightings in their local area. (I think it must have been some sort of rabbit protection/ wildlife organisation but I'm sorry I can't remember the name) If rabbits are so endangered then ' bunny hills' could be a very important site to help with their conservation.

•My own three young children have bags of energy and love nature. They just adore running around on the common picking blackberries, identifying trees, and playing in dirt! Not to mention sledging and playing in the snow! The Common is STUNNINGLY BEAUTIFUL in the snow!! Bliss!! It really is good for the soul going on the common!!!

Kind Regards

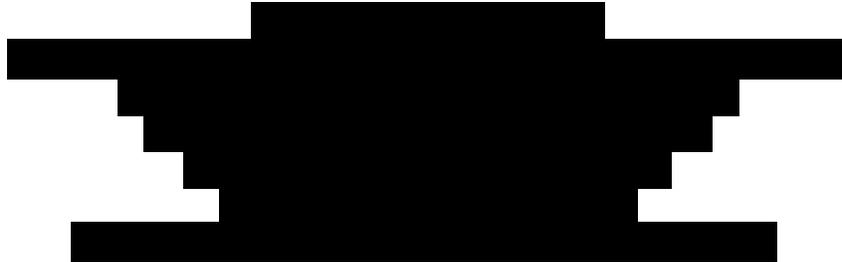
Ms Helen Thompson



Sent from my iPhone

From: LIZ ASHFIELD [REDACTED]
Sent: 13 September 2018 09:39
To: forwardplanningconsultations
Subject: Land off Falmouth Avenue

LIZ ASHFIELD & ANDY FAULKNER



To: [REDACTED]

9th September, 2018

Dear Sirs,

Plan for Stafford Borough: Part 2 – Protected Green Space – land off Falmouth Avenue

We are writing regarding the land off Falmouth Avenue which is bordered by Saxonfields and Falmouth Avenue/Falmouth Close and the railway line. This land is directly opposite our house and we would urge you to designate this land as Local Green Space in accordance with Policy SB3.

This particular piece of land is unique to the area and is not an extensive piece of land. It is hilly, fertile and very scenic. It is part of the Weeping Cross estate in Baswich and is used extensively by residents of Baswich for recreation. It has a diverse wildlife with the terrain being home to numerous rabbits and other mammals as well as many different birds. There are also many wild flowers growing there.

We often walk over the fields for both exercise and recreation. We work from home so often take short walks over the area to clear our heads and to get some fresh air away from the roads. [REDACTED] Having this area on our doorstep is a wonderful boon.

We are clearly not the only people that think so because it is extensively used by other members of the local community. Although the main use is for walking (there are not many times when you cannot find somebody walking their dogs over there), it is also a safe environment for the local children to play on. Many other activities also take place on these fields, e.g. bird watching, blackberry picking and, as soon as there is the slightest fall of snow, children go out on their sledges.

We feel that this land meets the criteria necessary to be designated as Local Green Space and we hope that you will include it as such in the Borough Plan.

Yours sincerely,

Liz Ashfield & Andy Faulkner

From: Pyner, David [REDACTED]
Sent: 13 September 2018 12:00
To: ForwardPlanning
Subject: [REDACTED]
Attachments: [REDACTED]

Please find a response to your recent consultation from Highways England

Regards

Dave

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Highways England Company Limited | [REDACTED]

[REDACTED]

[REDACTED]

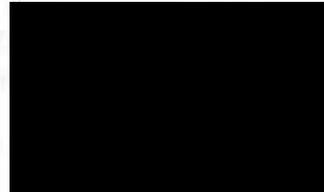
Consider the environment. Please don't print this e-mail unless you really need to.



Our ref: SHARE/
Your ref: New Stafford Local Plan

Graham Broome
Asset Manager
Operations Directorate

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



13 September 2019

Via Email:



Dear Sir/Madam,

NEW STAFFORD LOCAL PLAN CONSULTATIONS: SCOPING THE ISSUES REPORT AND SETTLEMENT ASSESSMENT WITH SETTLEMENT PROFILES

Thank you for forwarding me details of the above referenced Local Plan consultations.

Highways England is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England. The network includes all major motorways and trunk roads. The SRN in the vicinity of Stafford includes a section of the M6 motorway and short sections of the A50 and A500 trunk roads.

SCOPING THE ISSUES REPORT

It is noted that the consultation poses 31 questions, seeking feedback on all of the key policy areas. We have reviewed these questions, and those which are relevant to Highways England are commented on below.

Q2: What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

Highways England supports the delivery of new development which is supported by the timely delivery of any necessary highways infrastructure, such as has been determined through a robust transport base and/or site specific technical assessment. It also supports development which optimises opportunities for sustainable transport choices. Through development of this nature, it is expected that economic benefits will be derived through reducing congestion and improving journey reliability. Environmental benefits will be delivered by limiting emissions and improving air quality and health and wellbeing benefits will arise from increased access to leisure and wellbeing opportunities and greater walking and cycling.



Q5: Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

Higher densities could be supported where there is access to sustainable transport choices, including public transport nodes such as rail stations and bus stops. Where such nodes are not available, consideration should be given to whether S106 or CIL monies could be used to help fund enhanced services, to support higher density living.

Q14: What are the best locations for new retail and leisure in the Borough?

New retail and leisure opportunities could be supported where there is good access to sustainable transport choices, including public transport nodes such as rail stations and bus stops. Where such nodes are not available, consideration should be given to whether S106 or CIL monies could be used to help fund enhanced services, to support these facilities.

Q21: There is a growing need to deliver the infrastructure needed to support sustainable transport choices. What could the Borough do to help make encourage more sustainable transport choices?

As set out in our response to question 2, there is a need for the Borough to develop a robust transport evidence base to underpin the new Local Plan. This will enable any necessary infrastructure to be identified and for strategies to be developed for their timely funding and delivery. The transport evidence base should be developed in consultation with key transport providers including the local highways authority (SCC) and Highways England.

Q24: Are there any specific transportation projects that the Council should be promoting in the Local Plan? If yes, please provide some detail.

At the present time, Highways England is not aware of any specific transportation projects that the Council should be promoting in the Local Plan.

However, it should be noted that Highways England has embarked on a major scheme on the M6 motorway between Junctions 13 and 15 currently scheduled to be complete by 2021/2022. The scheme is to make this section of the M6 a smart motorway, which means increased capacity.

SETTLEMENT ASSESSMENT WITH SETTLEMENT PROFILES

Highways England has reviewed this document and we are pleased to see that consideration has been given to key attributes such as accessibility to services and proximity to the highways network in order to inform a reasoned judgment in this matter.

There are no specific matters of concern to Highways England at this stage and we look forward to continued engagement over the next stages of Local Plan preparation.



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

Yours sincerely



Graham Broome
Operations Directorate - Midlands
Email: 



New Local Plan: Scoping the Issues Report

Response to consultation from Ingestre with Tixall PC *in italics*.

Question 1

What would you like the Borough to be like in the future?

We note that there is a need for more bungalows to be built for older people downsizing with good public transport to the town and local hospitals.

There should be no more development to the east of Stafford until a replacement for the previous Eastern Distributor road to M6 is completed.

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighbourhood to make it a better place to live?

An Easter Distributor road or equivalent is urgently needed. Currently HGVs can only cross the Sow/Trent valley at Radford Bank or Wolseley Bridge.

There also needs to be a more centralised shopping area in Stafford Town Centre. The new Riverside development has just destroyed the town centre.

3.8 The majority of development will be delivered through the Sustainable Settlement Hierarchy at Stafford, Stone and the Key Service Villages. Other smaller settlements in the Borough are currently not considered appropriate for growth as they have fewer services and facilities.

We confirm that there should be no further significant development at Ingestre or Tixall, including along the Tixall Rd and Hanyards Lane.

Question 4

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

Ingestre and Tixall do not wish to grow, but need small homes for young people and downsizing pensioners.

Question 6

3.14 Housing should be of a high quality, sufficient quantity, affordable and of the type needed in order to create successful communities. It is important to plan for a mix of homes, and a range of sizes and types to meet both current and future housing needs.

We support this. Currently developers build too many "Executive Homes" at the expense of smaller homes and bungalows for older people and young families.

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

We suggest small starters for young people and pensioners. Affordable housing should be planned to remain affordable and not be allowed to be extended, and thus increase in price in the future.

Question 10

What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

Poor broadband and mobile phone coverage in the rural areas.

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

Need to encourage more people working from home, provided there is better broadband and mobile phone coverage.

Question 13

What improvements would you like to see in those centres that you visit regularly? Should additional uses be supported other than retail such as residential, entertainment and restaurants? Please state the name of the centre in your response.

There is a need for cultural development using existing at risk buildings, e.g. the Shire Hall and Carnegie Library and to restore support for the Manchester Camerata Concerts.

Question 18

What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?

There is a need for more classes for adults and pensioners, e.g. in the town centre.

Question 19

19a What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?

19 b) Where should these be located/go?

There is a need for walk-in health centres in the town centre.

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

There is a need for better designation of HGV routes to offset use of inaccurate Sat Navs and foreign drivers with poor English. Currently many HGVs have to turn round in Tixall Village or by Tixall Obelisk when they find they cannot go any further.

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

There is a need for continuous cycle routes not intermittent ones which disappear at junctions at junctions and crossroads as at present.

Question 24

Are there any specific transportation projects that the Council should be promoting in the Local Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.

There is a need for alternative through route to the east of Stafford with a river crossing as proposed originally by the EDR.

Question 26

What could the Plan do to protect and enhance the Borough's Heritage Assets?

The Shire Hall and Carnegie Library buildings should be restored and reused to provide a sustainable community facility, not just more residential development.

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

Local Wildlife Sites, e.g. Lion Lodge Historic Saltmarsh should be supported and promoted.

Question 30

Which renewable technologies do you think are most suitable for development in the Borough? Please provide additional information as to why you deem these to be suitable.

More solar farms and wind turbines should be built at suitable sites and there is a need for more electric recharging points in the area.

From: Michael Askew [REDACTED]
Sent: 14 September 2018 10:39
To: forwardplanningconsultations
Subject: Representations to 'Scoping the Issues consultation' and 'Settlement Assessment and Settlement Profiles consultation' plus reissued Call for Sites forms
Attachments: Call-for-Sites - Birch House Lane Industrial Estate Limited (Sept 2018).pdf; Representations to New Local Plan Settlement Assessment - Birch House Lane Industrial Estate Limited (Sept 2018).pdf; Scoping the issues response form - Birch House Lane Industrial Estate Limited (Sept 2018).pdf; Location Plan - Birchhouse Industrial Estate, Cold Meece.pdf

Sir / Madam,

Please find attached our representations on behalf of Birch House Lane Industrial Estate Limited to the 'Settlement Assessment' and 'Scoping the Issues' consultations.

We previously promoted our client's site in the January 2018 Call for Sites exercise, and we have now updated and reissued this submission to align with the revised NPPF. A Location Plan is also enclosed to illustrate the extent of our clients' site.

I would be grateful if you could continue to keep my informed of future consultation stages for the emerging Stafford Local Plan.

Regards,

Michael

Michael Askew
Senior Planner

Knights plc
[REDACTED]
[REDACTED]
[REDACTED]

Knightsplc

Please [click here](#) to view our email disclaimer.

Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text" value="█"/>	<input type="text" value="Mr"/>
First Name	<input type="text" value="█"/>	<input type="text" value="Michael"/>
Last Name	<input type="text" value="█"/>	<input type="text" value="Askew"/>
Job Title (if applicable)	<input type="text"/>	<input type="text" value="Senior Planner"/>
Organisation (if applicable)	<input type="text" value="Birch House Lane Industrial Estate Limited"/>	<input type="text" value="Knights plc"/>
Address Line 1	<input type="text" value="c/o agent"/>	<input type="text" value="█"/>
Address Line 2	<input type="text"/>	<input type="text" value="█"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text" value="█"/>
Telephone Number	<input type="text" value="█"/>	<input type="text" value="█"/>
E-mail address	<input type="text" value="█"/>	<input type="text" value="█"/>

Name or Organisation	<input type="text" value="Birch House Lane Industrial Estate Limited"/>
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Part B – Please use a separate sheet for each representation

Name or Organisation	
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Question 1

What would you like the Borough to be like in the future?

To be aspirational in terms of its aims to deliver the necessary amount of new housing and employment in appropriate locations to serve all aspects of the Borough's population.

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

To provide a greater focus on delivering rural housing and economic development that would serve the rural community in accordance with paragraphs 78 of the National Planning Policy Framework (the 'Framework') as well as respond positively to paragraphs 83 and 84 of the Framework).

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

By taking full advantage of opportunities to deliver new developments on suitable sites in rural locations which can in turn contribute towards supporting the economy of rural areas in accordance with paragraphs 79 and 84 of the Framework which seek to provide good quality homes and places to work in accessible locations for rural communities and support the rural economy, thus enabling the sustainable growth of rural neighbourhoods and enhancing the quality of life for local people.

Question 4

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

By promoting the redevelopment of a range of sites within rural areas, which can be accessed by the rural community, to deliver residential and economic development commensurate with the respective villages and the surrounding rural communities in accordance with paragraphs 78, 79 and 84 of the Framework.

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

No comments

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

If the Council cannot find sufficient PDL sites to meet the need for housing and employment requirements then, in accordance with paragraph 117 of the Framework, it should firstly consider sites that contain a mix of brownfield and greenfield land before considering sites that are entirely greenfield. To this effect my client has an available site at Birch House Lane Industrial Estate, Cold Meece (which has already been promoted in the previous Call for Sites exercise) that could bring forward a comprehensive residential development, a more extensive employment site (including starter units and more modern facilities) or a mixed use development.

Question 9

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing which includes pitches for gypsies, travellers and travelling show people. Where should the Council look for suitable brownfield sites for new pitches?

No comments

Question 10

What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

Creating an increased focus to providing new residential and employment development within the rural areas (in locations that are or can be made sustainable) in accordance with paragraphs 78 and 83 of the Framework.

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

Yes, particularly within the rural area where it is necessary for new sites to be provided that can provide improved facilities including to meet modern business requirements in accordance with paragraphs 11 and 83 of the Framework.

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

The need to provide housing and employment development where it is appropriate in order to meet the aspirations of the wider Borough and to compete with adjacent local authority areas (in order to avoid outward migration). Maintaining viability and a range of services within town, village and neighbourhood centres is a key challenge in these times where the likes of online facilities (shopping, etc.) have adversely affected vitality and vibrancy of such centres. Amending the Local Plan to facilitate sustainable growth across the Borough (including in the rural area (including in and at appropriate sites near to villages of all sizes) would help to maintain and enhance the important role of town, village and neighbourhood centres.

Question 15

Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres, and if so, where?

The provision of some offices in rural areas would support rural communities and the rural economy in accordance with paragraph 83 of the Framework.

Question 16

What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?

No comments

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

Support more housing and employment sites in rural locations in order to serve the rural community and thus reduce emissions as a result of the reduced need to commute in accordance with paragraphs 78 and 83 of the Framework. Spreading housing and economic development across the Borough rather than directing it primarily to larger urban areas would reduce congestion and associated pollution / air quality problems in and around the larger urban areas.

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

No comment

Question 22

Any there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

No comment

Question 23

What economic development opportunities do you consider could arise from HS2 for the Borough?

A potential New Garden Village at the MoD site in Cold Meece is already being moted to meet the Borough's housing needs. It is suggested that if this scheme were to come forward, then the site at Birch House Lane Industrial Estate (which adjoins the MoD site) should be incorporated into the masterplan for its development on account of its partial brownfield status in accordance with paragraph 117 of Framework.

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

No comment

Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

No objections to a Green Belt review. Notwithstanding this, rural sites outside of the Green Belt should be considered preferable to Green Belt release in terms of their potential to deliver economic and residential development. Our client's site at Birch House Industrial Estate is located within the rural area and has the potential to contribute to future economic and/or housing needs in the rural area.

From: Hannah Baker [REDACTED]
Sent: 14 September 2018 12:05
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: Stafford New Local Plan - Scoping the Issues and Settlement Assessment
Attachments: let.052.AJ.AY Stafford New Local Plan Settlement Assessment Representations.pdf; CEG Scoping the issues response form.pdf; let.051.AJ.AY Stafford Local Plan Scoping the Issues Report Representations.pdf; Site Location Plan - July 2015 - 01920164.pdf

To whom it may concern,

Please find attached representations to the above consultation.

I trust these will be duly considered. However should you need any further information please contact myself or Amy James (cc'd).

Kind regards

Hannah

Hannah Baker | Senior Planner

[REDACTED]



RTPI Planning Consultancy of the Year 2017

[REDACTED]



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Scoping The Issues Report: Response Form

Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

**2. Agent's Details
(if applicable)**

Title	<input type="text"/>	Mrs
First Name	<input type="text"/>	Amy
Last Name	<input type="text"/>	James
Job Title (if applicable)	<input type="text"/>	Associate
Organisation (if applicable)	CEG	Indigo Planning
Address Line 1	C/O Agent	[Redacted]
Address Line 2	<input type="text"/>	[Redacted]
Address Line 3	<input type="text"/>	[Redacted]
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	[Redacted]
Telephone Number	<input type="text"/>	[Redacted]
E-mail address	<input type="text"/>	[Redacted]

Name or Organisation	Indigo Planning on behalf of CEG
----------------------	----------------------------------

Part B – Please use a separate sheet for each representation

Name or Organisation	Indigo Planning on behalf of CEG
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Question 1

What would you like the Borough to be like in the future?

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

Please refer to the cover letter

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

Please refer to the cover letter

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

Please refer to the cover letter

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

Please refer to the cover letter

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Please refer to the cover letter

Question 24

Are there any specific transportation projects that the Council should be promoted in the Local Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.

Question 25

National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally.

Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

Please refer to the cover letter



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

By email

14 September 2018

[Redacted]
let.051.AJ.AY.01920164

Dear Sir/Madam

STAFFORD BOROUGH COUNCIL NEW LOCAL PLAN: SCOPING THE ISSUES REPORT (JULY 2018)

We write on behalf of our client CEG, in response to the above consultation. CEG has an interest in land which lies to the east of the existing Stafford East Sustainable Urban Extension (SUE) (see enclosed Location Plan) which is already being successfully built out by a series of national house builders.

What follows are representations on the above consultation document, which we request are taken into account as the new Local Plan progresses.

Question 2 – What do you think should be the key economic, housing, environmental, social, community and health outcomes that the new Local Plan should help to deliver?

The revised National Planning Policy Framework (NPPF) carries forward the Government's objective of "*significantly boosting the supply of homes*" (paragraph 59). For the new Local Plan to be consistent with the NPPF, policies, should also seek to boost significantly the supply of housing. It should ensure that sufficient land is available in suitable and sustainable locations to not only meet housing needs but boost supply.

The extension to the Stafford East SUE is a suitable and sustainable site that is available to come forward in the short term to assist the Borough in boosting its housing supply and meeting local housing needs. Further merits of developing this site for housing are set out in the later part of this letter.

With regards to the current approach to housing delivery, as set out in the adopted Local Plan, the needs of Stafford Town are to be met through the delivery of three SUEs; one to the north, east and west. Ambitious delivery targets were set for the northern and western SUEs and to date, these two SUEs have not been delivering housing at the rates anticipated. Despite slow progress at the northern and western SUEs, the eastern SUE has already secured consent for 623 dwellings out of a possible 653 and has delivered 237 units. It is anticipated that the whole allocation will be built out by 2022.



The new Local Plan, therefore, needs to ensure that it identifies sufficient land around Stafford Town in order for needs to be met and the supply of housing boosted. Furthermore, Stafford Town is identified in the settlement hierarchy as being the *“largest urban area in the Borough with a regionally significant service centre role...a key role in driving growth”* (New Local Plan Settlement Assessment July 2018). Therefore, as it is the key growth area of the Borough, it is vital that sustainable and deliverable sites, such as the extension to Stafford East, are identified to enable the settlement to meet its objectives of being the key growth area.

Question 5 – Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

The revised NPPF does seek to ensure that developments do make optimal use of the potential of each site. One of the suggested means of achieving this is through setting minimum density standards for city and town centres and other locations that are well served by public transport (NPPF paragraph 123).

However, there could be site specific circumstances that impact upon the density developments are able to achieve. Therefore, any policies which do seek to encourage specific densities to be achieved should be sufficiently flexible to enable each site and scheme to be considered on its individual merits in terms of the densities it is able to deliver.

There would be objection to any policies imposing strict density targets to be met. Ensuring flexibility would be reflective of the provisions of the NPPF, which does note that in some instances *“it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than on broad density range”* (paragraph 123).

Question 6 – National policy states that the Council should priorities the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

Utilising brownfield land to assist in meeting an areas housing need is strongly encouraged throughout the revised NPPF. However, it does not go as far as setting out a sequential assessment which requires all brownfield sites to be considered for redevelopment in the first instance and only when all these can be discounted should greenfield sites be considered. Therefore, the introduction of a mandatory sequential *“brownfield first”* assessment in the new Local Plan would not be supported as it would be contrary to the provisions of the NPPF and would also hinder the delivery of sustainable greenfield sites which can contribute towards meeting housing need.

It is important to note that the presumption in favour set out in the NPPF relates to sustainable development, regardless of whether the site is brownfield or greenfield; *“at the heart of the Framework is a presumption in favour of sustainable development”* (NPPF paragraph 10). Sites/schemes should, therefore, be



assessed as to whether or not the proposal would represent sustainable development, not whether it is on a brownfield or greenfield site.

Land to the east of the existing Stafford East SUE is a greenfield site, but offers a sustainable development opportunity involving the extension of the existing settlement limits on the eastern edge of Stafford Town. This would provide additional housing land and support the creation of a new community hub along with new education facilities.

It is a circa 73ha site and seeks to build on the extensive infrastructure provisions, including a mix of uses and public transport accessibility already available in this area of the town, whilst also facilitating a further improved service offering.

In light of the ongoing delays to the delivery of the existing planned SUEs at Stafford North and Stafford West and the need for the Council to plan for further housing delivery in and around the town, the expansion of Stafford East is the next logical deliverable extension for the town. A detailed report was submitted towards the Council's Call for Sites consultation in January 2018 and July 2018; this submission demonstrated the site's suitability for the delivery of new housing alongside a mix of other uses.

The site is deliverable, meeting the criteria set out in the NPPF definition. It is being promoted by CEG and is **available** for development immediately, with no landownership issues to prevent it being brought forward.

Whilst it is located outside the current settlement boundary of Stafford Town, it is well connected to the built-up area in terms of its relationship to the Stafford East SUE. There are no environmental factors that would render the site as unsuitable for residential development. On this basis, the site is **suitable** and delivery of housing at the site is **achievable**. Having considered the sites potential for development, the landowner is also confident that the proposal is economically **viable** in the current economic climate.

The NPPF does also acknowledge the importance of large greenfield sites, such as the Stafford East extension, being developed in order to meet housing need. It states at paragraph 72 (emphasis added):

*“the supply of large numbers of new homes can often be best achieved through planning for large scale development, such as new settlements or **significant extensions to existing villages and towns**, provided they are well located and designed and supported by the necessary infrastructure and facilities...strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way”.*

This demonstrates that there is an acceptance, at the national level that sites, such as the Stafford East extension, can offer a sustainable solution to providing additional housing land in order to meet the needs of the Borough. Therefore, as the new Local Plan is being prepared, the extension to Stafford East should be



considered and taken forward as a potential housing allocation. This aligns with the findings of the Local Plan Part Two Inspector, which acknowledged that extending the Stafford East SUE would deliver a further 1,250 dwellings in a relatively un-constrained and sustainable location; the Inspector considered that this is a matter to be considered at the plan review stage; which is now.

Question 7 – National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

There should be flexibility for sites to deliver a mix of housing which meets the demands and needs of the local community at that time. These needs and demands will change over time and over the twenty year plan period, therefore, any future policies will need to take this into account and be sufficiently flexible.

Ensuring flexibility in the mix of housing delivered accords with the provisions of the revised NPPF, which states at paragraph 59 “it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of *groups with specific housing requirements are addressed*”. Allowing sites and schemes to dictate the mix of housing will enable the “specific housing requirements” at that time to be addressed, as opposed to having a rigid policy requiring a specific mix, based on the needs when the plan was adopted.

Question 8 – The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self-build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Providing a good mix of dwelling types and sizes is important in terms of ensuring that the needs of the community and overall Borough are met. In terms of whether there is a community / Borough need for self-build plots needs to be based on robust evidence.

The Stafford Borough Self-Build and Custom Housebuilding Register (October 2017) has only 25 entries of people registering an interest in obtaining a self-build plot. With regards to the preferred locations for these plots, out of the 25 entries, Stafford was only identified by four people. This evidence indicates that there is only very limited interest and requirement for self-build plots not just in Stafford Town but across the Borough as a whole.

Based on the evidence currently available, there is no clear indication of a need for self-build plots; in short, there is no evidence to justify a requirement for large sites to reserve areas for self-build plots. If large sites were required to reserve areas for self-build plots, then as there is currently no interest or demand, this could mean these reserved areas remain empty.

On the basis of the above, there is objection to any policy which requires a specific percentage of large sites to be reserved for self-build plots and any such policy should not be carried forward due to a lack of evidence and justification.

Question 25 – National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

It is accepted that good design is important and new development coming forward should be of a high standard and reflective of its surroundings. This is set out at paragraph 124 of the NPPF, which notes *“good design is a key aspect of sustainable development, creates better places in which to live and work and helps makes development acceptable to communities”*. However, there would be objection to any mandatory requirement for all major development schemes to have to engage in pre-application discussions with the local design panel.

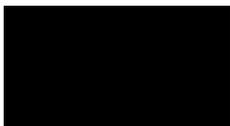
We do welcome a willingness from the Council to engage and offer feedback and comments, including on design, during site promotion and / or application preparation workstages. There are merits to early engagement and as set out in the NPPF (paragraph 39) *“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties”*, having the potential to reduce matters of disagreement once an application has been submitted.

However, there are instances where timing/programme does not allow for lengthy and prolonged pre-application discussions with various departments / panels. Local design panels can often have a pre-set programme of potential meeting dates and sometimes these may be restricted to one opportunity per month to meet and received feedback from the panel. If this was the case and there was a mandatory requirement to engage with the Local Design Panel before submitting an application, this could in some instances impact upon project timeframes.

We trust these representations will be taken into account as the new Local Plan progresses and request we are placed on the mailing list to receive updates on the emerging Local Plan and its associated evidence base.

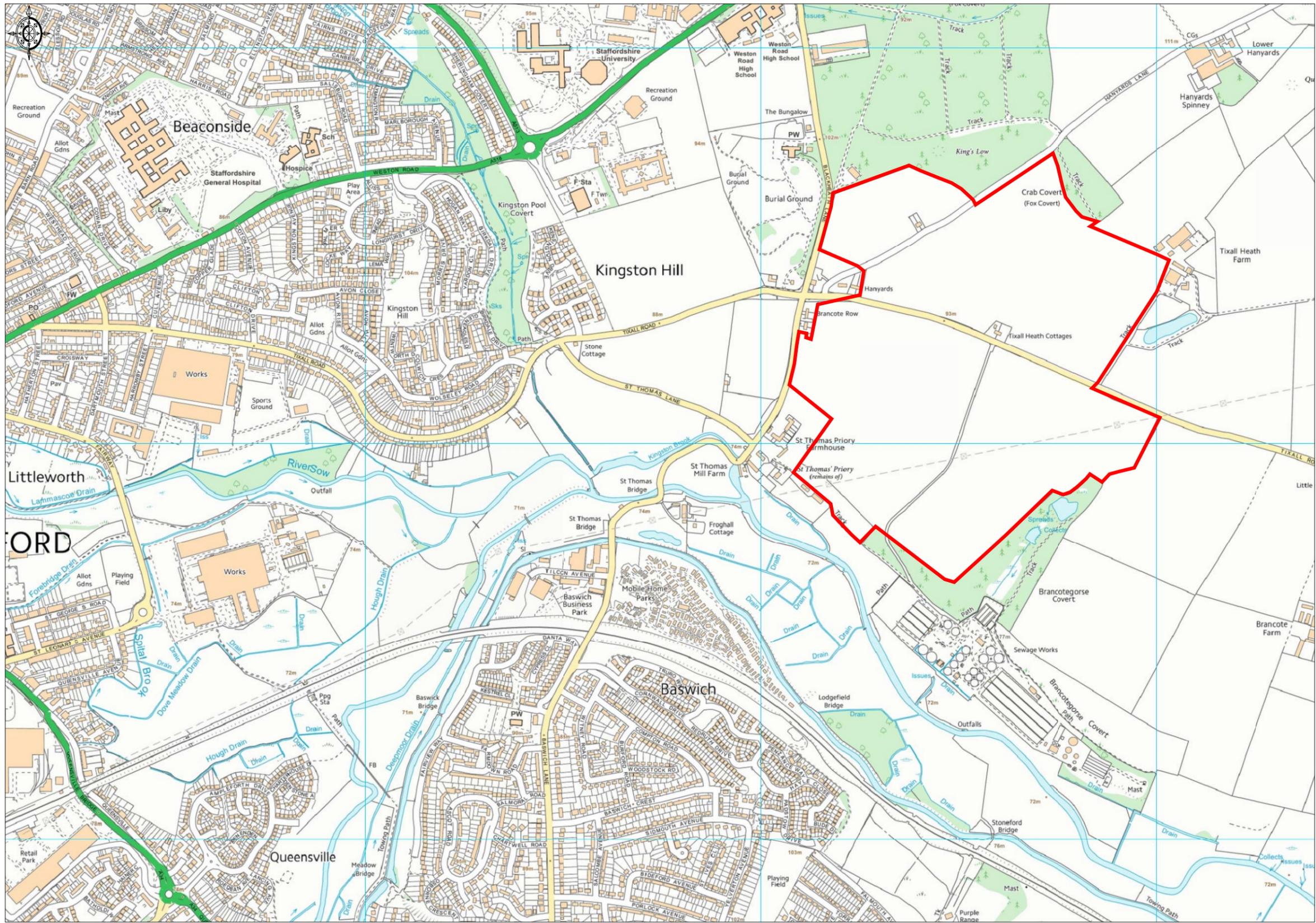
If there are any queries, please do not hesitate to contact us.

Yours faithfully

A solid black rectangular box used to redact the signature of Amy James.

Amy James

Enc: Stafford East Extension Site Location Plan



Ordnance Survey © Crown Copyright 2015. All rights reserved. Licence number 100022432. Plotted Scale - 1:10000
Promap

Key — Site boundary

Project Land east of Stafford
Title Site location plan
Client Commercial Estates Group

LPA Stafford Borough Council
Date: July 2015
Scale: 1:10,000
Project No: 01920164
Drawing No: 001
Drawn By: KN

Indigo Planning Limited





From: Joseph Cramphorn [REDACTED]
Sent: 14 September 2018 10:11
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: New Stafford Borough Local Plan
Attachments: Scoping the Issues Response Form.pdf; Settlement assessment representations.pdf

Dear Sir / Madam

I am pleased to attach representations in response to the new Stafford Borough Plan Scoping the Issues and Settlement Assessment consultation.

These representations are submitted on behalf of landowners at Stone Road, Eccleshall.

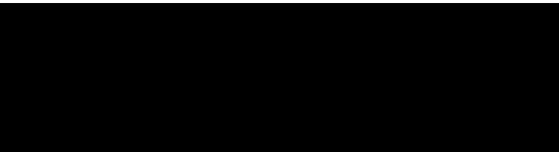
Should you have any difficulties in viewing these documents please do get in touch.

I would be grateful if you could provide confirmation of receipt of these representations at your earliest convenience.

Kind regards

Joseph

Joseph Cramphorn
Graduate Planner
Planning



 Before printing, think about the environment



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Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Private Landowners	Mr
First Name		Michael
Last Name		Davies
Job Title (if applicable)		Director - Planning
Organisation (if applicable)		Savills
Address Line 1		██████████
Address Line 2		██████████
Address Line 3		
Address Line 4		
Postcode		██████████
Telephone Number		██████████
E-mail address		██████████

Name or Organisation	Savills
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Part B – Please use a separate sheet for each representation

Name or Organisation	Savills
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Question 1

What would you like the Borough to be like in the future?

N/A

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

The delivery of housing will have a positive impact on all of these outcomes. When formulating the new local plan, it should be noted that Stafford Borough Council's Corporate Business Plan 2018 – 2021 aims: "To deliver sustainable economic and housing growth to provide income and jobs". Alongside this, the delivery of housing should also provide positive social, community and health outcomes. This includes developer contributions towards improvements to local services, along with the build-up of a critical mass of residents to enable the provision of new community facilities.

The key objectives should include maintaining a balanced portfolio of housing and employment sites in the most sustainable settlements, alongside delivery of appropriate and commensurate infrastructure to support housing and economic growth. A local plan which encourages development in the area will allow for developer contributions to fund improvements to the area that fulfil these outcomes and a critical mass of residents to ensure the viability of local services.

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

We understand that the existing Doctor's surgery facility in Eccleshall is constrained in terms of parking and has limited scope to extend. We consider that a new residential development south of Stone Road could provide a location for a new Doctor's surgery.

Question 4

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

The new Local Plan can support the growth of villages by providing new housing and employment opportunities. There should be an emphasis on growth in village locations, as development if planned correctly can improve the sustainability of villages. This approach can also provide the necessary contributions to fund new and improved community facilities and public services.

Such development should be targeted towards Key Service Villages, such as Eccleshall as updated by the new settlement assessment. If development is targeted towards the most sustainable locations, it can also improve the viability of such locations to support community and public services. We consider that appropriate housing growth in the right places will enable the Council to provide a balanced portfolio of housing and employment sites.

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

No. Each location (site and settlement) should be considered on its own merits, and subject to existing constraints, opportunities, character and proximity to public transport. All of these factors will provide varied influences on the density of development that is appropriate in each location.

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

The Council should focus on providing new development opportunities in the most sustainable settlements with an appropriate range of services, facilities and access to employment opportunities.

The settlement assessment is a useful tool in identifying the most appropriate locations to direct major new employment and housing growth. Specifically we consider that Eccleshall represents one of the strongest performing Key Service Villages where new development can be accommodated.

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

The new Local Plan should make provision for flexibility to allow a mix of housing types to be provided. This should be based on the latest evidence, for example the SHMAA. Although evidence based, the plan should not be overly prescriptive in dictating required housing mixes and each site should be assessed on its individual characteristics and location.

This flexibility is required to ensure that the right housing product is provided in the most appropriate location. Therefore a generic mix for the whole district would not provide an appropriate degree of flexibility on mix and dwelling type. This is important to ensure that locations for new housing identified as suitable in the new local plan can be delivered appropriately.

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Self-build may provide an attractive option for some, but it is not clear how the design and construction of these proposals will be appropriately managed. Furthermore, on large development sites, there is a question mark over how self-build could affect delivery rates. More information is required on delivery and how appropriate local plan policies will be applied.

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

N/A

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

A key challenge facing these centres is the capacity and provision of suitable community and public services. The viability of such uses is increased through the provision of development to increase the number of residents and therefore the viability of providing such services in these areas. Provision of new and upgraded community facilities will be enhanced where sites with sufficient critical mass can provide support for the delivery of new facilities (e.g. Doctor's Surgeries).

Question 19

19a What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?

A new doctor's surgery in Eccleshall

19 b) Where should these be located/go?

Within Eccleshall. The current surgery is located in the village Centre but is constrained with limited / no opportunity to extend. We consider that land south of Stone Road could provide an opportunity to relocate the existing surgery facility to a new purpose built site with appropriate parking provisions, alongside a new residential development.

Question 22

Any there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

Improvements to public transport, particularly to serve key service villages should be encouraged. The local plan should make provision for improvements to public transport to enable delivery of development within these locations.

Question 23

What economic development opportunities do you consider could arise from HS2 for the Borough?

N/A

From: Nick Sandford [REDACTED]
Sent: 14 September 2018 16:07
To: forwardplanningconsultations
Subject: Woodland Trust comments on your Revised Local Plan Scoping Report

On behalf of the Woodland Trust I would like to offer the following comments on your Local Plan Scoping the Issues Report July 2018. I did try to download the comments form but unfortunately it failed to download and jammed up my computer, so I hope an email will suffice.

My details are:
Nick Sandford
Regional External Affairs Officer
[REDACTED]

Question 16

We would like to see creation of new woodland and planting of trees in a variety of other contexts (eg trees in streets or parks or in housing area) prioritised in your local plan, in recognition of the wide range of social, economic and environmental benefits that trees and woods are able to provide; eg shading to keep areas cool in summer, alleviation of flooding, removal of air pollution, combatting climate change etc. It is particularly opportune to look for opportunities to plant trees and create new woods as part of new housing development, to encourage people to go out of their homes and get healthy exercise in the surrounding area.

In your current local plan at para 11.23 of Part 1, you refer to the Woodland Trust's Access to Woodland Standard. This can be used to derive woodland creation targets and we would be happy to talk to your officers further about this. The Standard aspires that everyone should have a small woods of at least 2ha in size within 500 metres of their home and a larger wood of at least 20ha within 4km of their home. Very few councils achieve 100% compliance with these standards but some councils have set targets based on the Standard in their local plans or in other strategies. For further information please refer to <https://www.woodlandtrust.org.uk/publications/search/?query=space+for+people>

Question 20

We would like to see the role of street trees recognised in your local plan for their ability to absorb pollutants and hence improve air quality. The type of tree that is planted and the location is crucial: the best place to plant trees for this purpose is at busy road junctions. Further information can be found at <https://www.woodlandtrust.org.uk/publications/2012/04/urban-air-quality>

Question 28

We would like your new plan to replicate the very strong protection given to ancient woodland and ancient/veteran trees in part 1 of your current local plan. This is particularly important as these habitats are irreplaceable and hence need the highest possible level of protection in planning policy. This has been recognised by Government in the new revised NPPF which has recently been published. Para 175 of the new NPPF states that ancient woodland and ancient/veteran trees should only be lost to development in wholly exceptional circumstances.

Question 30

We would like your Local Plan to consider the various ways in which trees and woods can contribute to alleviation of climate change: both in mitigation and in adaptation. Trees can absorb CO2 and hence mitigate against climate change and wood can be an environmentally sustainable source of fuel. They can also facilitate adaptation in a variety of ways, including alleviation of surface water flooding by reducing the rate at which rainwater gets into the drainage system. For further information this please refer to: <https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow> . Trees can also help in adaptation by providing shading and helping to combat the urban heat island effect.

[Redacted]

A non-profit making company limited by guarantee.

[Redacted]

[Redacted]

[Redacted]

From: [REDACTED]
Sent: 14 September 2018 17:37
To: forwardplanningconsultations
Subject: Stafford Borough Council - New Local Plan: Scoping the Issues Report Consultation
Attachments: Consultation-Response-PPO-007-260-143.docx

Dear Forward Planning Team

Following the policy consultation on 18 July 2018, please find attached our comments relating to the above policy.

If you would like to discuss any of the issues raised, please contact us.

Regards

Planning and Local Authority Liaison team

[REDACTED]

Resolving the impacts of mining. [REDACTED]

[REDACTED]



The Coal
Authority

Stafford Borough Council - New Local Plan: Scoping the Issues Report Consultation

Contact Details

Planning and Local Authority Liaison Department

The Coal Authority

[Redacted]

Planning Email:
Planning Enquiries:

[Redacted]

Date

14 September 2018

Stafford Borough Council - New Local Plan: Scoping the Issues Report Consultation

Thank you for your notification received on the 18 July 2018 in respect of the above consultation.

As you will be aware there is coal mining legacy within the Stafford area in the form of; 3 mine entries, thick coal outcrops which may have been subject to historic unrecorded workings and fissures and breaklines.

I can confirm that the Coal Authority has no specific comments to make at this early stage in the process.

Regards

[Redacted]

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

From: Julie Jackson [REDACTED]
Sent: 15 September 2018 10:49
To: forwardplanningconsultations
Subject: COMMENTS ON Stafford Borough Council: New Local Plan Consultation
Attachments: Response to New Local Plan-Scoping the Issues Report Consultation_deadline 18 September 2018 .docx; Response to New Local Plan-Settlement Assessment Consultation_deadline 18 September 2018.docx

Please find attached my comments on:

Scoping the Issues Report
Settlement Assessment with Settlement Profiles

The sections and text of interest have been extracted from each document and followed by my comments.

Thank you,

Miss J Jackson

[REDACTED]

New Local Plan: Scoping the Issues Report (July 2018)

Page 7:

Section 2.1

“... making sure new services and facilities such as health, education and leisure activities are provided to the local community ...”

Response: This was not the case with Hixon in the last Local Plan. How can the borough council guarantee such joined-up thinking/planning?

Section 2.6

“- To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing strong communities that promote health and well-being.”

Response: Some settlements are already at this stage, which is why the residents have chosen to live there. It needs to be remembered that significant development can change the character of an existing “desirable” community, and not for the better. Such a negative impact then results in current residents leaving, and what was a “good” place has been undermined.

Page 8:

Section 2.7

“... “where will people be living and working?” and “what will they be doing in their spare time?” ...”

Response: Any response to these types of questions will merely be guesswork. It is impossible to accurately predict so far into the future.

Question 2

“What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?”

Response: In the past, businesses located where it was viable and convenient, then employment opportunities attracted residents, so housing was provided, followed by the desired leisure and required health and education facilities. Planning brings order to such development. However, it appears planning is more about building housing in the hope that businesses (including leisure establishments) will be attracted to the area, and that health and education services will cope.

Considering the extensive countryside, farming should be encouraged. It is surprising that this sector is not included and support offered.

Page 9:**Section 3.1**

“... excellent strategic transport links ... with High Speed Rail 2 (HS2), ...”

Response: HS2 is still far from becoming reality.

Question 3

“Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighbourhood to make it a better place to live?”

Response: More consideration should be given to those who have retired and look for a safe and tranquil community in which to live, where those within the same age group and lifestyle can experience mutual support. Such areas do exist now, and imposing unwanted changes would alter the character to the detriment of the current community and force people to leave.

Page 10:**Question 4**

“How could the new Local Plan support local villages and their communities to grow and thrive?”

Response: Support should be given to maintain current bus services and promote mobile services (e.g. libraries) and outreach services (e.g. GP clinics, post offices).

Question 5

“Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?”

Response: There should be fixed densities in rural areas, especially for rural exception sites, to prevent housing estates and closely clustered homes being built. The number of dwellings should definitely not exceed a total of 10 for the whole settlement; otherwise, rural areas will take on an urban character.

Page 11, Question 6

“National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?”

Response: Cleaning up land for regeneration should be seriously investigated. Since there is usually some transport access for previous use, linking this to existing transport links should also be looked into. In addition, current development of brownfield sites should be extended, possibly by building upwards. This does not just mean flats/apartments, but what about maisonettes (i.e. 2-storey buildings incorporating houses on 2 floors. Finally, there will come a point, if the whole of Stafford borough is not to be bricked over, when the limit is reached!

Page 12:**Question 7**

“National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?”

Response: Forecasts suggest homes for older people, some with facilities for those experiencing mobility problems will be in demand. This could be catered for through sheltered housing, retirement villages, and bungalows

Question 8

“The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self-build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?”

Response: I would suggest 1% on new developments comprising over 100 dwellings, if necessary. However, it is difficult to see how this will work, for instance, the consistency in styles could be variable.

Page 13, Question 9

“National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing which includes pitches for gypsies, travellers and travelling show people. Where should the Council look for suitable brownfield sites for new pitches?”

Response: Given the history of animosity between transit and non-transit communities, perhaps it would be wise not to locate pitches in the midst of permanent residences. In time this may change, but people take time to accept one another and cannot be forced; when they are forced, then enmity tends to escalate.

Page 14:**Question 10**

“What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?”

Response: There seems to be an overemphasis on food/drink establishments in urban-type areas, while retail is not flourishing. Perhaps entertainment/tourism would fare better.

Question 11

“Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?”

Response: Agriculture/farming should be supported, and perhaps wildlife, craft, and historical attractions for visitor. It is surprising that there is considerable effort in establishing new sectors to the area when there remain current employment sectors, for which a demand already exists, requiring more encouragement and support.

Page 18, Question 19(b)

“Where should these [facilities] be located/go?”

Response: The GP surgery in Great Haywood needs to extend its services and reinstate its outreach clinics just to accommodate the current residents. Since the developments under the last Local Plan, the surgery is no longer able to support the growing patient list and it is becoming impossible to book appointments, despite outreach clinics being withdrawn.

Page 24, Question 28

“What approach should the Local Plan take to ensure that Borough’s natural assets are protected and where possible enhanced?”

Response: Previously, assessments for developments/planning applications simply concentrate on "designated areas" with little regard for existing habitats elsewhere without some sort of "official status." However, areas that are recognised as special and requiring protection, often stems from earlier developments destroying such sites.

Page 25, Question 29

“The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?”

Response: No; otherwise Staffordshire will just become another West Midlands-style conurbation.

Page 26, Question 31

“This document sets out the issues that need to be addressed through the new Local Plan. There may be matters that have been missed or that are not covered by the other consultation questions. Are there any matters you think also need to be considered at this stage and why?”

Response: Existing rural communities should be protected from overdevelopment.

From: [REDACTED]
Sent: 17 September 2018 09:09
To: forwardplanningconsultations
Subject: Scoping consultation

Dear Sir/Madam,

Scoping and Issues Report.

Question 15 talks about 'other town centres' but the document as a whole suggests that little consideration has been given to places like Rugeley and Uttoxeter in spite of the statutory requirement to work across boundaries.

Question 31 might consider the effects of the internet, self drive cars, electric vehicles and Brexit for instance.

Para 1.3 refers to the 'latest Local Development Scheme' ie the timetable. The one on the web site is out of date.

Para 3.7 says that the draft National Planning Policy Framework(NPPF) has a new chapter on Rural Housing. It has a new section but not a new Chapter.

Para 3.19 identifies the needs of the community but this gets outweighed by the Strategic Housing Market Assessment(SHMA) which is very general and the current housing waiting list which is very poor.

Few people put their name on the list.

The SHMA is on too course a scale – down to Borough Ward area. The Borough say that this is the most detailed level available from the census but this is not true. Census Output Areas contain about 125 houses, the Parish of Colwich, for instance, has about 7 OAs.

Para 3.44 Where is the support for walking and Rights of Way?

Para 3.70 Misses out Chartley Moss – a Ramsar site.

--

John Blount
Clerk to Stowe by Chartley Parish Council.

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From: [REDACTED]
Sent: 17 September 2018 12:22
To: forwardplanningconsultations
Subject: Reply to consultation New Local Plan
Attachments: New Local Plan Scoping the issues report.docx

Dear Sir/ Madam

Re: New Local Plan - Scoping the issues report

You have asked for comments on the above report.

Please find attached the reply from Colwich Parish Council with our comments on your questions.

Regards

Anthony Egan PSLCC
Deputy Parish Clerk
Colwich Parish Council

[REDACTED]

[REDACTED]

[REDACTED]

If you have received this e-mail in error, please notify Colwich Parish Council and then delete the e-mail and all attachments immediately. This e-mail and its attachments are confidential and may contain privileged information, if you are not the intended recipient any disclosure, copying, distribution or other use of this e-mail or attachments is strictly prohibited. Whilst all reasonable care has been taken, no guarantee is given that it is free from any virus and Colwich Parish Council accepts no liability or responsibility for such viruses. This e-mail is not intended nor should it be taken to create any legal relations, contractual or otherwise.

Stafford Borough Council

New Local Plan

Scoping the Issues Report

Colwich Parish Council have considered the report and reply as follows:

Question

Colwich Parish Council reply

Question 1

What would you like the Borough to be like in the future?

The Council would like the Borough to have a similar mix of housing and industrial estates as at present. Any new development should be matched equally with infrastructure to support it. The Borough should preserve a high quality countryside, e.g. with high biodiversity. The Borough should respect the existing adopted Neighbourhood Plan.

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

The Local Plan should deliver quality and sustainability to meet local needs and the local environment, while paying greater head to local concerns.

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighbourhood to make it a better place to live?

The Council would like greater co-operation / investment in the local infrastructure (e.g. sewerage), with real accountability on local problems such as flooding and relevant bus services. The Council would like to see greater engagement with local people, businesses and agriculture.

Question 4

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

The Local Plan should support villages better by providing a better alignment of infrastructure and local transport, where there is new development. It should provide greater encouragement for starter homes and for homes for the elderly. The Local Plan should insist that developers and the planning department are held accountable for planning conditions. There should be automatic site visits by all relevant agencies for all new development.

Question 5

Do you consider that the new Local Plan should set

Yes, there should be differing densities depending on the location, local character and needs of local residents.

out a range of densities for the Borough and if so, are there any specific locations?

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

The Borough Council should, firstly, provide incentives for developers to use brown field sites, where presently the cost is too prohibitive to clean up and use the site. Secondly, the Borough Council should accept offers of land to ensure a five year land bank, but which do NOT try to change the agreed settlement boundaries in parishes that already have a Neighbourhood Plan in place.

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

There will be most need for affordable housing, single occupancy dwellings and homes for the elderly. These types of housing should be encouraged over the coming years. There should be proper enforcement of these types of property and developers should not be allowed to avoid this commitment by the use of various devices.

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self-build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Self-build would be very popular. 20% of large sites could be allocated to self-build in order to encourage sustainable innovation. Builders should not allowed to overcharge for the land.

Question 9

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to

The same criteria should apply to gypsies and travellers as to any other group of people.

existing services for new housing which includes pitches for gypsies, travellers and travelling show people. Where should the Council look for suitable brownfield sites for new pitches?

Question 10

What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

The main barriers are a lack of affordable, regular transport in the area and insufficient speed and capacity for broadband. There should be support for start-up costs and provision of realistically “affordable” housing.

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

The availability of land for employment is sufficient in Staffordshire.

Question 12

What do you think are the key challenges facing the Borough’s town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

For Stafford town centre, it should be necessary to support development at the north end of the town. Efforts should be made to encourage short term pop up businesses in empty units. A better parking policy is required, which does not penalise businesses and customers. The Local Plan should encourage individual businesses and shops, so that there will be a more individual type of shopping experience and not just the usual national chains.

Question 13

What improvements would you like to see in those centres that you visit regularly? Should additional uses be supported other than retail such as residential, entertainment and restaurants? Please state the name of the centre in your response.

See answer to Question 12 above.

Question 14

Existing towns are the best place for this.

What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?

Question 15

Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres, and if so, where?

There is no need for further retail development outside of the existing centres.

Question 16

What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?

More tennis courts are required and they should be preferably hard court and floodlit. More Multi Use Games Areas are required in the Borough area also.

Question 17

National policy gives councils new powers to protect valued open spaces by designating them as Local Green Spaces. Are there any open spaces that are special to your local community which should be designated? If yes, please provide details of the open space, its location and the reason why it is special to you and your community.

Colwich Parish already has two local green spaces designated in its Neighbourhood Plan and these should be respected in any future Local Plan. We would like the area bounded by the West Coast railway line, the Trent and Mersey canal and Mill Lane to be additionally designated as a Local Green Space. This area is valued by local residents for its biodiversity.

Question 18

What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?

The area of Hopton needs new schools to support the new housing in the Borough. Another secondary school is required and more capacity is required for primary education.

Question 19

19a What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?

- a) An additional /satellite Health Centre or GPs surgery is required and should be located in Weston to support both new and existing communities.
- b) It should be located in Weston to support Weston and the surrounding villages.

19 b) Where should these be located/go?

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

The Local Plan could help to reduce road traffic by providing better bus services and proper, safe cycle routes. There should be no parking near to schools and more use should be made of walking buses. There should also be speed restrictions near to schools. Park and Ride services for Stafford town centre would help and this would allow the town centre to be pedestrianised. Electrification of local transport would help to reduce pollution and more electric vehicle charging points need to be installed.

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

The Local Plan should promote the reinstatement of bus services to all the borough. The Borough Council should be dedicated to maintaining proper bus services in remote areas (even if this is uneconomic).

Question 22

Are there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

See answer to question 21. Also in Stafford town centre bicycles for hire should be available as they are in London.

Question 23

What economic development opportunities do you consider could arise from HS2 for the Borough?

There are no opportunities from HS2 in the Borough.

Question 24

Are there any specific transportation projects that the Council should be promoting in the Local

The Local Plan should promote the joining of the eastern ring road from the end of Beaconside to Baswich, crossing the A513 to the A34.

Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.

Question 25

National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally.

Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

Yes there should be closer ties with the local design panel. The Local Plan should encourage respect for the Local Green Infrastructure Plan and for the Local Design Plan.

Question 26

What could the Plan do to protect and enhance the Borough's Heritage Assets?

The Plan should protect Borough assets by using the assets for something appropriate, by finding new uses for redundant buildings, if necessary.

Question 27

What approach should the Local Plan take to ensure that Borough's landscape, AONB and its key features are protected and enhanced?

No development should be allowed to encroach on the AONB. Any development adjacent to a Borough landscape should be sympathetic.

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

There should be a review of the Borough's natural assets. There should be no development on these assets (they should be ring fenced). For any development there should be formidable mitigation. Greater use should be made of Green Infrastructure Plans which are found in Local Neighbourhood Plans.

Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do

No review is necessary.

you consider review is necessary?

Question 30

Which renewable technologies do you think are most suitable for development in the Borough? Please provide additional information as to why you deem these to be suitable.

Solar and wind power should be encouraged. The Borough has many suitable locations for wind generation. Water generation by water pumps should also be encouraged as the Borough has a lot of water courses such as rivers and canal weirs.

Question 31

This document sets out the issues that need to be addressed through the new

Local Plan. There may be matters that have been missed or that are not covered by the other consultation questions.

Are there any matters you think also need to be considered at this stage and why?

The negative impact of HS2 on the environment and the local infrastructure should be considered. The disruption to businesses during the construction period should also be considered.

From: TownPlanning LNW [REDACTED]
Sent: 17 September 2018 13:10
To: forwardplanningconsultations
Subject: Stafford - New Local Plan

Network Rail is keen to work closely with Stafford BC particularly in relation to any development proposals at or adjacent to the railway station to ensure that station enhancements and capacity improvements are given due consideration.

Regards

Diane Clarke AssocRTPI
Town Planning Technician LNW
Network Rail

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Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.

[REDACTED]

From: Stephen Locke [REDACTED]
Sent: 17 September 2018 16:14
To: forwardplanningconsultations
Subject: Representations for SBC Scoping the Issues Report and New Local Plan Settlement Assessment
Attachments: Scoping the issues response form Land at Stone.pdf; statement to accompany SBC settlement assessment.pdf

Dear Sir / Madam

Please find attached our representations for the above local plan consultations.

We act for a number of landowners who own the land to the south and west of Stone.

If you require the documents in a Word format please do not hesitate to contact me.

Please can you confirm receipt.

Yours faithfully

Stephen Locke
Planning Consultant

Part B – Please use a separate sheet for each representation

Name or Organisation

MESSRS WEAVER, GREEN, PLANT,
ANDERSON & MARGINSON

Question 1

What would you like the Borough to be like in the future?

We agree with the Stafford Borough Council’s objectives for the borough to become an even greater place of opportunity, enterprise and excellence. It is important that the borough continues to work with local partners to provide for future local needs for homes, employment and business sites, while protecting the most valuable countryside and maintaining a high quality of life.

This should be achieved through the delivery of sustainable development through social, economic and environmental objectives through a plan-based approach.

The National Planning Policy Framework seeks to direct development to the most sustainable locations. These are the places which are easily accessible and have a variety of services and community facilities.

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

The key outcomes for economic development should be to support growth, innovation and promote productivity, while identifying and coordinating the provision of appropriate infrastructure. Where possible, major economic developments should be focussed around larger settlements and existing employment sites. The new local plan should help create the conditions in which businesses can invest, expand and adapt. The borough Local Plan also needs to address barriers to investment, such as poor infrastructure, services or housing, or areas of poor environmental standards. It will be important for the borough to identify key strategic sites, such as the land to the south-west of Stone, which can meet local and regional investment objectives.

Identifying areas around the Borough where infrastructure is limited and where new infrastructure is required is vital to kick-start further employment and housing growth. This could include road and rail links and appropriate service infrastructure such as power, water and drainage supplies.

The Local Plan needs to positively plan for the provision of community facilities such as local shops, schools, doctors’ surgeries, places of worship and sporting venues and meeting the needs of an ageing population.

In terms of housing, the Borough needs to maintain a sufficient supply of sustainably located housing land to meet the changing demographic needs of the population and the expansion of the borough through economic growth. A positive and proactive approach should be taken to ensure that sufficient choice of school places is available. It is vital that the Council consider from an early stage the social and economic impacts of new development.

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

It is important that the Borough actively manages patterns of growth in support of the provision of a sustainable transport and infrastructure system. Currently one of the major transport problems is the capacity of the A34 at Stone and especially the connection of the Eccleshall Road to the A34 dual carriageway which is only going to get more substandard as HS2 develops.

An opportunity exists to provide a new link-road off the Eccleshall Road to the east of the M6 Motorway which would help to take some traffic to the south-west of Stone and onto the A34, thus reducing the pressure on the existing road network and providing new opportunities for employment, housing and wider community infrastructure.

Question 4

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

Some additional sustainable development in rural areas including villages should be supported to enable the maintenance and enhancement of existing rural communities. Services such as rural schools are under pressure to survive and some new development in these areas would help villages to grow and thrive rather than becoming commuter dormitories. Services in these locations need to be maintained, developed and modernised in a way that is sustainable and retained for the benefit of the community.

The key to enabling villages to grow and survive is to ensure that some additional growth is supported. It is important to ensure that all communities have a variety of housing stock which reflects a variety of needs.

By providing more homes in smaller settlements, services and facilities such as schools, shops and other community facilities can be supported and sustained.

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

The supply of large numbers of new homes can often be best achieved through planning for larger scale development such as extensions to existing towns and villages. Here, a variety of densities can be accommodated. It is inappropriate to suggest a specific density for an area and it is more important to ensure that a variety of homes and employment sites are provided to meet the needs of different sectors of the community.

As part of this submission we would like to promote the strategic location of the land south west of Stone which also fronts the A34 to the south of Stone Business Park and borders the B5026 Eccleshall Road. This site provides a major opportunity to sustainably expand the town and meet the long terms needs of both the local community and the wider aspirations of the Borough.

The sites relationship with Stone and the potential to extend the existing business park will reduce the need to travel and provide opportunities for local people to work closer to home. The site is also within 2 km of the centre of Stone which is a key sustainability consideration.

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

If the Council cannot find enough suitable brownfield sites, it should look to sustainable greenfield sites or sites that can be made sustainable through the provision of appropriate services and facilities.

Ideally, if a greenfield site is identified, it should be located appropriately to support the role that town centres play as the heart of their communities, by taking a positive approach to their growth management and adaptation.

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

We know there is a significant demographic shift with both the number and proportion of older people increasing. It is important to recognise population changes and projections and to provide a mix of homes to meet the needs of different groups such as families with children, older people and single people and those with disabilities and those with care support needs.

The Borough needs to plan to meet the needs and demands of a varying population such as the provision of lifetime homes, age-appropriate housing and the adaptation of homes to enable people to live in their own homes for longer. In terms of types of housing, this will need to be a mix of sizes and types to meet current and future needs.

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

It is recognised that demand exists for self-build development plots, however with regard to their provision within a large site, these sites need to be carefully identified to ensure they will be developed sustainably and to a high-quality design.

Challenges exist with the provision of self-build sites within larger sites. These include consistency of design, timescale of construction, site safety and access, the economic viability of the sale of individual plots within a larger development.

Question 9

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing which includes pitches for gypsies, travellers and travelling show people. Where should the Council look for suitable brownfield sites for new pitches?

No comments to make

Question 10

What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

The Borough is well located and benefits from good quality transport links such as the M6 motorway and west-coast mainline rail route. This is both a blessing and a curse as it can encourage people to live in the Borough and commute to the larger settlements such as Birmingham, Stoke on Trent and the wider West-Midlands conurbation.

A balance is required to ensure that suitable employment opportunities are available locally and that suitable housing and services are available for those people seeking such employment.

The quality and availability of education is also considered as it is important to ensure that people within the Borough have the opportunity to meet their full potential which will hopefully ensure that they remain living and working within the borough and contribute to the sustainability of the local economy.

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

It is crucial that additional land is allocated for employment uses. Sites should be located in accessible and well serviced locations. It is important that the Borough builds on its strengths, tries to counter any weaknesses and addresses the challenges of the future. One area for potential growth is expansion of new high-technology areas such as that in creative industries and insuring clean growth and encouraging new sectors to the Borough.

As previously highlighted, the land to the south-west of Stone is a key location for new employment development, offering a sustainable location of such a scale that will enable the Borough to meet its anticipated needs over the next planning period.

Stone is also increasingly becoming recognised for its food offer with a number of high-quality food establishments, the Stone Food and Drink Festival (20,000 visitors) and the towns historic links to the brewing industry. There is an opportunity to grow this reputation and potential by attracting food processors and food technology firms to the town. This could be achieved by the development of a new food and technology park on the land to the south west of the settlement.

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

Some of the major challenges facing the area relate to the declining town centres and efforts need to be made to turn around the economic fortunes of the area.

Small market towns such as Stone face unprecedented challenges and innovative approaches are required to ensure regeneration and survival in the face of out-of-town developments and the increase in online retail.

Although community led solutions have a strong part to play, it should not be left to the community alone to address the challenges. While the health of the high street in towns such as Stone is a very visible issue, it must also be understood that their economic and social wellbeing is dependent on wider issues such as employment, development, housing, training and transport. It is imperative that new markets and businesses are attracted to the area to underpin the economy and vibrancy of the town centre.

The need to identify innovative ways to provide public services and to encourage an agenda for change. Facilities and services should be maintained, developed and modernised in a way that is sustainable and retained for the benefit of the community. The further provision of jobs and homes in the Borough would support the provision of existing public services in the area and also potentially allow for the development of new public services.

Question 13

What improvements would you like to see in those centres that you visit regularly? Should additional uses be supported other than retail such as residential, entertainment and restaurants? Please state the name of the centre in your response.

Financial incentives could potentially enable businesses to succeed in Stone. Capitalising on its status as a Market Town, with its canal, history and heritage make it an attractive location for high quality residential development supporting first class business development, as well as providing for the needs of future generations, through the provision of retirement homes, and a vibrant local economy and community ethos.

The long term aim for Stone should be to ensure the name is synonymous with quality, productivity, innovation and efficiency.

Question 14

What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?

The key challenge is to ensure that the existing town centres such as Stone are able to respond to rapid changes in the retail and leisure industries, allowing a suitable mix of uses (including housing) and reflecting its distinctive character.

The overriding vision should be to attract more visitors, better brands and greater choice to the Borough. This will encourage existing residents to spend locally and attract more tourists into the area.

Increasing employment opportunities in towns such as Stone and clustering in key high value activities such as software, technology, advanced manufacturing and creative and cultural activities will help to generate income locally which will filter down to improved leisure developments.

Question 15

Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres, and if so, where?

Ideally, need will be dictated by demand. There is already a very healthy pipeline of stock and continued additional permissions may push the market into a state of over-supply. We have seen out-of-town schemes continue to evolve and it is likely that we will see an increasingly diverse tenant mix in the future. Getting the right scheme in the right place at the right time is crucial.

This being the case, it is imperative to maintain a degree of flexibility with regard to the development of retail and leisure sites in locations outside existing retail centres. Incentives such as free parking, park and ride, late night shopping and purpose-built leisure and shopping experiences can encourage people into the borough.

Question 16

What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?

We are not currently fully aware of all of the provision within the borough and therefore it is difficult to comment, however any new residential development will need appropriate public open space and recreation facilities.

By providing footpath and cycle links to existing facilities, a holistic approach can be developed to further support those existing facilities, to increase the portfolio of leisure facilities within the Borough and to encourage people to be active.

Question 17

National policy gives councils new powers to protect valued open spaces by designating them as Local Green Spaces. Are there any open spaces that are special to your local community which should be designated? If yes, please provide details of the open space, its location and the reason why it is special to you and your community.

No comment.

Question 18

What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?

This submission aims to support the strategic expansion of Stone. Any major new development areas will require new educational facilities and the aim should be to enhance, strengthen and improve education facilities in the Stone Area to support the new development. This will ensure that people don't have to travel too far to access the services they need.

Question 19

19a What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?

The local plan needs to embed the provision of social, recreational and cultural facilities and services within communities. We are a growing and ageing population and our health needs are getting more complex.

At the point where a new large-scale residential development is identified, it would be necessary to plan for the health and social care needs of the newly expanded community. This would be dependent upon the anticipated demographic of the area.

It is important to recognise that there are differences between local areas and different areas of the Borough has differing needs. There is a drive towards more care in the community but local community services need to be provided / upgraded to meet modern needs.

Towns such as Stone could provide a focus for additional local community provision which may ease some of the pressure on the County's hospitals.

19 b) Where should these be located/go?

The proposed urban extension to the south-west of Stone would enable a variety of health, social and community facilities to be an integral part of the overall development scheme which would also benefit the existing community.

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

The government in National Planning Guidance makes it clear that air quality and pollution should be improved. The Local Plan can encourage non-polluting activities and improvements to air quality through the promotion of such technology as electric charging points for vehicles and renewable and sustainable energy sources such as solar panels.

Sustainable transport systems can also have a significant role in improving health and wellbeing.

When creating new large-scale developments, these initiatives and systems can be integrated at the outset.

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

Stafford Borough is substantially rural and cars are the primary means of transport for many residents. We accept that consideration needs to be given to how this reliance on cars can be reduced and the use of more sustainable modes of transport encouraged. There are particular stretches of roads or junctions in the District that can become congested such as the roundabout where the B5026 meets the A34 at Stone.

Infrastructure is needed to support new growth and key priorities for infrastructure improvements. Locating employment land close to where people will live will help to encourage people to live close to their work.

Improved public transport corridors are important but it is vital that key areas of congestion are reduced as this will merely slow down all traffic, including public transport such as bus routes.

Question 22

Any there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

In the short to medium term, we will continue to have dependence on the car for transport needs. The way forward would be to take advantage of smart technologies, new working practices and shared mobility so we are less car-dependent for those trips where we genuinely are car-dependent.

A key transport project would be the connection of the A34 to the B5026 to the south-west of Stone. This would encourage inward investment into the town and alleviate traffic problems, thus strengthening Stone's role as a key settlement within the Borough.

The scale of the strategic site is sufficiently sustainable to allow funds to be generated to improve accessibility to the town centre by means including footpaths, cycleways and public transport.

Question 23

What economic development opportunities do you consider could arise from HS2 for the Borough?

The proposed railhead terminus and construction yard for HS2 to the west of Stone would help to create employment in the construction industry and potentially create permanent jobs. It is important that transport links proposed as part of the HS2 transport project are integrated with the new development proposals for Stone.

It would be unfortunate if the infrastructure benefits provided by HS2 would not be adequately linked to the local infrastructure needs. HS2 provides a wider transport and environmental opportunity and it is therefore imperative for the Borough to work closely with HS2 to ensure that the maximum benefits are achieved for the area.

Consideration could be given to the early creation of local infrastructure to alleviate potential traffic problems caused by HS2. This could have long-term benefits for the wider community both in terms of improved transport links and reduced congestion.

Question 24

Are there any specific transportation projects that the Council should be promoted in the Local Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.

As identified above, we feel that a new highway link to the south-west of Stone, connecting the A34 with the B5026 would have major local social and economic benefits.

Question 25

National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally.

Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

We agree that all new developments should be of a high design standard that reflect and respects the local character, setting and local context.

Closer ties with the local design panel would identify projects where early engagement can have a positive impact on the design process. We recognise that large scale projects require significant front-loading in terms of design and consultation, but liaison with design panels must be proportional and timely so that constructive comments and guidance on schemes can be acted upon and sites can be bought online for development in a timely way.

Question 26

What could the Plan do to protect and enhance the Borough's Heritage Assets?

We recognise that the Borough is rich in terms of its Heritage Assets. A proportionate approach should be taken with regard to the importance of Heritage Assets. Any new development should respect the guidance in Chapter 16 of the recently amended NPPF 2018.

Question 27

What approach should the Local Plan take to ensure that Borough's landscape, Area of Outstanding Natural Beauty and its key features are protected and enhanced?

Any new development should demonstrate that its impact on the landscape has been considered and future planning decisions should ensure that areas of high landscape value are should be conserved, protected and where appropriate, enhanced. Where possible, land for development should be allocated on land which has the least environmental and amenity value.

Large scale development sites should be supported by a landscape and visual impact assessments where necessary.

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

Large scale development sites should be supported by an environmental and biodiversity assessments where necessary and also have the potential to provide habitat gains, such as new woodlands, water bodies, wildlife corridors and habitats. As previously mentioned, the guidance in the new NPPF (2018) should be considered.

Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

We support the protection of Green Belt where possible but accept there may be exceptions where very special circumstances dictate that Green Belt policy be outweighed by other considerations.

Given the size of the Borough and potential for development outside Green Belt, it is felt that relaxation of Green Belt boundaries are not required at this stage.

Question 30

Which renewable technologies do you think are most suitable for development in the Borough?
Please provide additional information as to why you deem these to be suitable.

The Borough is best suited to technologies such as small-scale solar photo-voltaic panels, anaerobic digestion plants, ground source heat pumps, single wind turbines, biomass plants and the development of biofuels.

Question 31

This document sets out the issues that need to be addressed through the new Local Plan. There may be matters that have been missed or that are not covered by the other consultation questions. Are there any matters you think also need to be considered at this stage and why?

We broadly agree with the Council's aims to create successful places and to facilitate the delivery of high quality, sustainable and well-located development supported by the timely provision of infrastructure.

As highlighted above, we wish to promote the expansion of the market town of Stone and appreciate that it needs to be developed in a collaborative way with local communities and local stakeholders to provide long-term benefits for all.

The land to the south-west of Stone can be delivered in a timely way and will provide a major sustainable allocation for housing, employment and community infrastructure growth which will alleviate development pressures in other areas of the Borough.

Thank you for your response on the New Local Plan

From: Philip Sharpe [REDACTED]
Sent: 17 September 2018 17:34
To: forwardplanningconsultations
Subject: Stafford New Local Plan Consultation

Dear Sirs,

Stafford New Local Plan Consultation – Scoping The Issues Report

Thank you for consulting us on the above.

The Inland Waterways Association (IWA) was founded in 1946 and is a membership charity that works to protect and restore the country's canals and river navigations. IWA is a national organisation with a network of volunteers and branches who use their expertise and knowledge to work with navigation authorities, government and other organisations for the benefit of the waterways and their users. The Association also provides practical and technical support to waterway restoration projects, and acts as a national 'umbrella' organisation for numerous local waterway societies and trusts that promote and protect waterways in their areas.

In response to your Question 31 about other matters, we would like to comment as follows:

The Plan For Stafford Borough includes Policy E7 Canal Facilities and New Marinas, with supporting text at 9.29, and IWA expects that this policy will be carried forward into the new plan.

IWA is generally content with the provision this makes for canal related developments and facilities, and with the description of the Shrewsbury & Newport and the Stafford Riverway Link projects, although a more explicit expression of support for these waterways restoration projects would be welcome.

However, we consider that the following condition should be removed from the policy:

h. There are no permanent moorings for residential use.

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

Regards,

Philip G. Sharpe

Chairman & Planning Officer
Inland Waterways Association, Lichfield Branch

The Inland Waterways Association is a non-profit Distributing Company Limited by Guarantee [REDACTED]

From: Green, Katherine (GVA) [REDACTED]
Sent: 17 September 2018 17:47
To: forwardplanningconsultations
Subject: New Local Plan: Scoping the Issues Consultation
Attachments: 180917 St Philips Scoping the Issues Response Form.pdf; 180917 St Philips Scoping the Issues Response.pdf; 180108 Castle Street Vision Document Low Resolution Part 1.pdf

Dear Sirs,

Please see attached our response to the New Local Plan: Scoping the Issues Consultation which is made on behalf of our client St Philips. This includes the Council's Response Form '180917 St Philips Scoping the Issues Response Form', Representations Document '180817 St Philips Scoping the Issues Response' and Strategic Vision Document Part 1.

Due to the file size of these documents I have sent the Strategic Vision Document Part 2 in a separate email.

Should you require any further information, or there are any issues opening the attached documents, please do not hesitate to contact me on the below details.

Kind regards,

Kate Green
Graduate Planner

GVA
[REDACTED]
[REDACTED]



[REDACTED]

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Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	C/O The Agent	Miss
First Name		Kate
Last Name		Green
Job Title (if applicable)		Graduate Planner
Organisation (if applicable)		GVA
Address Line 1		[REDACTED]
Address Line 2		[REDACTED]
Address Line 3		
Address Line 4		
Postcode		[REDACTED]
Telephone Number		[REDACTED]
E-mail address		[REDACTED]

Name or Organisation	GVA
----------------------	-----

Part B – Please use a separate sheet for each representation

Name or Organisation	GVA
----------------------	-----

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

Key outcomes that the Local Plan should include the right amount and mix of homes across a variety of locations within the Borough. This will be underpinned through the identification of the Borough’s objectively assessed housing need, which will be determined through the Strategic Housing and Economic Land Availability Assessment and the introduction of the Government’s standardised methodology for calculating objectively assessed housing need that is embodied within the revised National Planning Policy Framework 2018 (NPPF 2018).

The results of the Standard OAN, published as part of the draft Revised National Planning Policy Framework 2018 consultation process, provides a base line for Local Planning Authorities preparing new Local Plans. In the context of Stafford, this equates to 424 dwellings per annum

Notwithstanding this position, a review of the Standardised OAN results is expected in November 2018 following the publication of household projections from the Office for National Statistics.

The Local Plan will need to implement that outcome of the revised Standard Methodology assessment with regard to the level of housing growth and this should be reflected within the emerging document. In this respect, the emerging plan will need to comply with paragraph 33 of the NPPF which advises that;

“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.”

The emerging Local Plan and policies for the supply of housing and those relevant to settlement boundaries should therefore be prepared flexibly, with suitable wording to ensure that these can be amended to reflect changing housing needs throughout the plan period and with a specific rolling review mechanism at least every 5 years.

The emerging Local Plan will also be required to direct housing growth appropriately, in line with the Settlement Hierarchy. Development will therefore be directed to the larger settlements of Stafford and Stone in the first instance, followed by larger market towns and villages, including Eccleshall. Thus, new policies relating to housing should reflect this direction of growth and how it will be supported.

Part B – Please use a separate sheet for each representation

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Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

To ensure the creation of better places to live, work and play, local neighbourhoods are required to provide the right level of homes to support existing and future residents. This is supported through the Government's Housing White Paper, which was published in February 2017.

The Housing White Paper sets out new measures to speed up the supply of new housing and sets out that housing delivery has not kept up with population growth which has resulted in years of undersupply. A need for 300,000 new dwellings per annum by 2020 is subsequently identified.

In addition, the Government published the Revised National Planning Policy Framework in July 2018, which sets out at Paragraph 59 that:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

Stafford Borough Council's new Local Plan seeks to support the Government's agenda to meet the national housing shortage through the delivery of new dwellings and subsequent employment opportunities across a number of settlements within the administrative area. This will include directing development to Stafford and Stone, the two main settlements within the Borough, followed by Key Service Villages (KSVs) as identified in the existing Local Plan

St Philips has reviewed the proposed Settlement Hierarchy and agree, in principle, with the way in which development will be directed. Notwithstanding this position, the Developers wish to object to the status of Eccleshall within Settlement Hierarchy.

In this respect, as the Council will be aware Eccleshall is a town rather than a village and this should be reflected within the emerging Local Plan.

The settlements key role is demonstrated within the consultation document Settlement Assessment and Settlement Profile Consultation. In this respect, given the town's size, population and household, accessibility to employment and accessibility to shops, facilities and amenities, Eccleshall clearly performs a more important role within the Borough than that of a village.

It is therefore recommended that the status of Eccleshall should be elevated. This is recognised in paragraph 4.14 of the consultation document (New Local Plan Settlement Assessment) where parallels are drawn between itself, Stone, Stafford and the North Staffordshire Urban Area due to the *"range of retail, employment, education and community services, also referred to as the 'main settlements'"*.

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In this respect, St Philips recommends that another category be added to the hierarchy: 'Market Towns'. This should aim to accurately reflect the role of the town and subsequent policy wording should ensure that the right level of growth proportionate to the settlements size and scale will be reflected within emerging policies.

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Question 4

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

Our client agrees, in principle, with the proposed strategy to promote development through the Sustainable Settlement Hierarchy, currently adopted within the existing Local Plan. Under the existing hierarchy development will be directed to Stafford in the first instance, followed by Stone, before the 17 Key Service Villages.

The revised hierarchy directs growth as follows:

- Stafford;
- Stone;
- North Staffordshire Urban Area;
- Large Villages (500+ dwellings), including Eccleshall;
- Medium Villages (250 + dwellings); and
- Small Villages (50+ dwellings).

However, as set out in the response to question 3 St Philips wish to object to the status of Eccleshall within the Settlement Hierarchy. In this respect, as the Council will be aware Eccleshall is a town rather than a village and this should be reflected within the emerging Local Plan.

The settlements key role is demonstrated within the consultation document Settlement Assessment and Settlement Profile Consultation. Thus, given the town's size, population and household, accessibility to employment and accessibility to shops, facilities and amenities, Eccleshall clearly performs a more important role within the Borough than that of a village.

It is therefore recommended that the status of Eccleshall should be elevated. This is recognised in paragraph 4.14 of the consultation document (New Local Plan Settlement Assessment) where parallels are drawn between itself, Stone, Stafford and the North Staffordshire Urban Area due to the *"range of retail, employment, education and community services, also referred to as the 'main settlements'"*.

In this respect, St Philips recommends that another category be added to the hierarchy: 'Market Towns'. This should aim to accurately reflect the role of the town and subsequent policy wording should ensure that the right level of growth proportionate to the settlements size and scale will be reflected within emerging policies.

St Philips therefore recommend that the revised settlement hierarchy directs growth as follows:

- Stafford;
- Stone;
- North Staffordshire Urban Area;
- Market Towns including Eccleshall;
- Large Villages (500+ dwellings);
- Medium Villages (250 + dwellings); and
- Small Villages (50+ dwellings).

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In terms of delivering land for new housing the land at Castle Street is located on Greenfield land adjacent to the settlement boundary of Eccleshall and comprises the land east of Castle Street, as demonstrated in the site plan included in the Vision Document submitted as part of these representations. The site is well bound by a tributary to the River Sow in the north, existing development and agricultural land to the east, the existing settlement boundary to the south, and Castle Street to the west. The result of these defensible boundaries will reduce future development future development pressures and the further expansion of the town in this location.

The site represents a sustainable location for development in relation to the rest the village insomuch that amenities, facilities and opportunities to utilise public transport can be realised from the site access point. Furthermore, the site provides an opportunity to meet one of the aspirations of the Parish Neighbourhood Development Plan, as set out on Page 12 and 13 of the document. In this respect the masterplan proposes to deliver a Country Park and riverside walk along the banks of a tributary to the River Sow. Thus, enhancing the provision of open space within the existing community.

It is considered that the extension of the Settlement Boundary in this location provides an opportunity to deliver up to 20 residential dwelling, to support the growth of the Borough in a self-contained land parcel. As detailed, the site provides clear defensible boundaries which would serve to restrict the future growth of the settlement in this area.

Part B – Please use a separate sheet for each representation

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Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

Where appropriate, density guidance should be provided within the emerging policies of the new Local Plan. In this context, specific regard should be had to Stafford, Stone, and the North Staffordshire Urban Areas (as per the proposed Settlement Hierarchy) as development densities in these locations are anticipated to be much higher than those in rural areas. It is therefore suggested that a minimum density of 30 dwellings per hectare should be applied to these areas.

For all other settlements and proposed locations for development within the Borough, including Large Villages, Medium Villages and Small Villages (as per the proposed Settlement Hierarchy), it is considered that the density of development should be informed by the existing character and layout of the surrounding areas, housing needs, and accessibility to local services. Such locations should therefore be considered on a case by case basis.

In the context of the proposed development site, it is acknowledged that the density will be relatively low, at 8 dwellings per hectare. However, this affords the opportunity to provide a Country Park in line with the aspirations of the Eccleshall Parish Neighbourhood Development Plan, whilst maintaining a rural, soft edge to the settlement boundary and existing landscaping views from surrounding footpaths and the scheduled ancient monument comprising the castle.

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Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

Paragraph 117 of the Revised National Planning Policy Framework 2018 sets out that *“planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much as use as possible of previously-developed or ‘brownfield’ land.”*

Furthermore, Chapter 13 of the new Framework affords great importance to the retention, protection and enhancement of designated Green Belts, noting that the fundamental aim of Green Belt policy is *“to prevent urban sprawl by keeping land permanently open.”*

Paragraph 143 states that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”*

Therefore, should the Council not be able to find enough suitable Brownfield sites to meet housing and employment need across the Borough, they should seek to direct development to alternative, Greenfield sites, which do not harm or interfere with Stafford’s defined Green Belt.

As demonstrated throughout the supporting Vision Document the proposed development site, whilst not Brownfield, presents a sustainable development option which is available and deliverable now to support housing needs within the Borough. The Vision Document clearly sets out the self-contained nature of the site, its proximity to local services and amenities, together with public transport opportunities.

Most importantly, the site does not require release from the Green Belt and will be supported a landscape strategy to ensure the rural character of Eccleshall is maintained and enhanced, where appropriate.

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Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Our client is supportive, in principle, that a percentage of large sites should make available land to accommodate those listed on the Stafford Borough Self-build and Custom Housebuilding Register. At present there are currently 26 individuals with a registered interest requiring a variety of plot sizes in numerous locations across the Borough. Of the 26 registered, 14 have expressed an interest in self-build plots in Eccleshall, equating to approximately 4.02 hectares.

It is considered that whilst the existing register demonstrates only a low number of individuals interested in obtaining land for self-build and custom build dwellings, this could increase following the adoption of the plan. Therefore, the introduction of a policy that requires sites of over 20 dwellings or more to accommodate the need, where applicable, would ensure the land is safeguarded for this use.

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Question 10

What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

It is clearly demonstrated through both national and local planning policy that a key barrier to employment growth includes the provision of housing. Namely, the Government's Housing White Paper: Fixing our broken housing market, published in February 2017, sets out that *"to boost housing supply and, over the long term, inter alia, a more efficient housing market whose outcomes more closely match the needs and aspirations of all households and which support wider economic prosperity [is required]."*

The White Paper sets out that as a result of not enough Local Authorities planning for the homes they need; house building being too slow; and the construction industry being too reliant on a small number of big players, there has been a significant under-delivery of new homes since the 1970s and house building has struggled to keep up with population growth.

Consequently, *"sky-high property prices stop people moving to where jobs are", together with "low levels of housing building mean[ing] less work for everyone involved in the construction industry, inter alia, meaning less money gets spent in the wider economy."*

The Revised NPPF 2018 further supports this, most notably at Paragraph 8, which sets out the three strands underpinning sustainable development, including objectives relating to the economic role; social role; and environmental role of development. The NPPF recognises that these overarching objectives are *"interdependent and need to be pursued in mutually supportive ways"* and they will be delivered through the preparation and implementation of plans.

Thus, the delivery of new housing and the benefits that are afforded as a result of new development are intrinsically linked to the success of economic growth. In this context, the proposed development site would seek to provide a variety of economic benefits, namely the provision of both direct and indirect/supply chain construction jobs and during its operational lifetime through its resident population.

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The table below sets out the anticipated yield of employment opportunities based on a development of 20 dwellings with an average population size of 2.3 residents.

Construction	
Construction Phase ¹	20 x 1.2 = 10
Indirect / Induced Supply Chain Multiplier ²	20 x 1.51 = 30.2
Indirect / Induced Employment Multiplier ³	20 x 0.64 = 13
Operational	
Proposed number of residents	20 x 2.3 = 46
Population of working age ⁴	83.1% of 46 = 38 people
Economically active ⁵	88.6% of 38 = 34 people
Total employed ⁶	79.8% of 46 = 37
Employees in 'Major Group 1-3' ⁷	45.6% of 37 = 17

The figures within the table above demonstrate the economic benefits of the proposed development in terms of both economic prosperity and housing growth.

¹ The HBF's report 'The Economic Footprint of House Building in England and Wales' sets out that 3.1 jobs are created per dwelling. For every direct job, 1.51 indirect and induced jobs are also created. We have therefore assumed that from the total of 3.1 jobs per dwelling, 1.2 is attributed to direct job creation.

² For the purpose of these calculations we have used the figures calculated by the CEBR's report for the NHF which identifies a multiplier of 2.51, which indicates that for every 1 direct construction job, 1.51 indirect and induced jobs are created elsewhere in the supply chain and wider UK economy.

³ Barratt Developments' 2017 Socio-Economic Footprint identifies an induced employment multiplier of 1.64 indicating that for every 1 direct job created, 0.64 induced jobs are created elsewhere. This could involve employment opportunities supported by wage-spending of construction and supply chain workers in shops, services and other businesses.

⁴ Census 2011

⁵ 88.6% of working age population (Census, 2011)

⁶ 79.8% of working age population (Census, 2011)

⁷ 45.6% of employed population (Census, 2011)

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Question 16

What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?

It is recognised that the Eccleshall Parish Neighbourhood Development Plan establishes five aspirations to be delivered through future development proposals, including:

- Road infrastructure around the town or an alternative route for heavy goods vehicles;
- Improvements to parking facilities within the town;
- Riverside Country Park area alongside the River Sow;
- Footpath on Chester Road to Pershall and the Football Club; and
- Central reservation and crossing point on Stone Road.

The Plan sets out that there is little open space in Eccleshall for a town of its size when compared to smaller surrounding villages which have publically maintained open space, supporting the provision of parkland and play facilities.

In order to help overcome this deficit, a Country Park to provide a walk along the bank of the River Sow is suggested as an aspiration to facilitate existing demand.

In response to these aspirations, the comprehensive Vision Document and masterplan for the land at Castle Street submitted alongside these representations and the SHLAA, has sought to retain a large proportion of the land within the boundary as a Country Park. Whilst this borders a tributary of the River Sow, it is considered that a link could be provided to enable the space to connect to the permissive Eccleshall Walk 8 route and subsequently provide riverside public access. In addition, an area of formal play will be located within this area of open space, together with informal play opportunities.

The proposals would therefore accord fully with the aspirations of the Neighbourhood Development Plan whilst also seeking to improve accessibility and enhance the provision of open space and leisure facilities within the Borough, whilst supporting leisure facilities to meet the needs of the emerging Local Plan.

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Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

It is St Philips view, that any potential development sites that are being considered as an allocation within the emerging Local Plan should be considered in light of their location and accessibility to amenities, facilities and services, together with sustainable transport opportunities. By their virtue, this would lead to a reduction in issues relating to pollution and air quality, ensuring that adverse impacts are minimised.

As demonstrated in the supporting Vision Document, the land at Castle Street is located on the edge of Eccleshall outside of the existing Settlement Boundary. The site is located approximately 200m to the north-east of the main high street and town centre.

A 2m footway is provided along the western side of Castle Street, whilst footways are provided on both sides of the highways circa. 100m to the south of the site.

St Philips have commissioned a Transport Assessment for the proposed development site. This demonstrates that the site is located in close proximity to a number of facilities and amenities, including a supermarket, GP Surgery and Pharmacy, Post Office and Primary School. These are all located within a 10 minute walk of the site, as summarised in the table below.

Amenity	Distance from the Site (km)	Walking Time (Minutes)
Co-op Supermarket	0.2	3
Post Office / Local Shop	0.2	3
Pharmacy	0.2	3
Nisa Supermarket	0.3	4
Doctors Surgery	0.3	4
Eccleshall High Street (Café/Cash Machine/Library)	0.3	4
Bishop Lonsdale Primary School	0.8	10

The nearest bus stops are located on Castle Street, immediately opposite the site, which provides northbound services. Another bus stop is located circa. 75m south of the site and provides southbound services. The table below summarises local bus provision from these services.

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Service No.	Operator	Route	Days of Operation	Weekday Frequency
12	D&G Coach and Bus	Fulford – Stone	Weekdays and Saturday	One per AM and PM peak
13A	D&G Coach and Bus	Stafford – Swynnerton	Weekdays and Saturday	One per AM and PM peak
14	D&G Coach and Bus	Hanley – Stafford	Weekdays and Saturday	One per hour (06.55 – 19.40)
14A	D&G Coach and Bus	Hanley – Eccleshall	Weekdays	Designated School Bus for AM and PM
15	D&G Coach and Bus	Stone – Swynnerton	Weekdays	One per AM and PM peak (also a school route)
15A	D&G Coach and Bus	Stone – Market Drayton	Weekdays	One per AM and PM peak (also a school route)
15B	D&G Coach and Bus	Stone – Norbury	Weekdays	One per AM and PM peak (also a school route)

There are multiple services provided from Stone, including services reserved for school pupils who may need to access secondary schools. In addition, Service 14 provides hourly connections to Stafford with journeys taking approximately 20 minutes.

The nearest rail station is located in Stafford and can be accessed from the site via the number 14 bus service in approximately 20 minutes. Rail services include:

- 3 per hour to Birmingham New Street;
- 3 per hour to Liverpool;
- 2 per hour to London Euston;
- 2 per hour to Manchester;
- 1 per hour to Bournemouth; and
- 1 per hour to Bristol.

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It is noted that Stafford Railway Station will become a hub station to for HS2. Namely, the 'Stafford Station Gateway Masterplan' proposes the development of land near to the railway station will include up to 650 apartments, 150 dwelling houses, a multi-storey car park and leisure facilities.

HS2 aims to reduce journey times to London from one hour fifty five minutes to fifty minutes.

It can therefore be demonstrated that the land at Castle Street is well connected to the surrounding highway network and is conveniently located to existing key amenities which are within a reasonable walking distance to serve future residents. The site is served by pedestrian links, together with bus services to nearby major centres, including Stone, Stafford and Stoke-on-Trent.

It is therefore considered that development at the site would seek to reduce the impacts relating to pollution and air quality, thus affording a highly sustainable development site.

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Question 25

National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally.

Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

It is St Philips position that, where applicable, a local design panel should be established and engaged to support the on-going masterplanning of potential development sites, where they are of a major scale, are particularly complex, or are sensitive in nature.

St Philips consider it critical however that any such Design Panel should be fully accessible to the planning application process and that the potential for delay minimised. It is also important that any Design Panel Reviews are undertaken alongside the consideration of key technical matters to ensure that these are positively considered in light of the wider site opportunities and constraints.

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Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

Land should only be released from the Green Belt in the event that other Brownfield or non-Green Belt land is not available.

In this respect, the land at Castle Street is comprised solely of Greenfield land and demonstrates a sustainable opportunity adjacent to the settlement boundary of Eccleshall to accommodate the future growth of the Borough without the need to release additional Green Belt land.

Thank you for your response on the New Local Plan



Stafford Borough Council Local Plan Consultation

Scoping the Options

St Philips Response

September 2018

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Prepared By: Kate Green, Graduate Planner

Status: Final

Date: September 2018

For and on behalf of GVA Grimley Limited

1. Introduction

- 1.1 These representations have been prepared by GVA on behalf of our clients, St Philips, in relation to the Stafford Borough Council New Local Plan Scoping the Issues Report. This consultation process seeks to identify matters and issues within the Borough of Stafford to be addressed by the revised Local Plan.
- 1.2 St Philips have interest in the land east of Castle Street, Eccleshall, edged red on the Site Boundary Plan in the supporting Vision Document, submitted in conjunction with these written representations.
- 1.3 The existing Local Plan covers the period 2011-2031, and seeks to manage new development, such as housing, shops and green spaces. The Plan contains a vision, spatial principles and specific policies, whilst Part 2 of the Plan details settlement and Recognised Industrial Estate boundaries together with a policy protecting community / social facilities.
- 1.4 Stafford Borough initiated their Local Plan Review in July 2017 with a Call for Sites consultation for new development including the Brownfield Land Register. The proposed development site was submitted as part of this process as an extension to the settlement boundary of Eccleshall to accommodate 20 residential dwellings. The Plan will replace the adopted Plan for Stafford Borough Part 1 and Part 2. Its aims are to set out the long-term spatial vision for the Borough.
- 1.5 The 'Scoping the Issues' report intends to identify existing and anticipated issues for the Borough across the new plan period (2020-2040). Thus, the consultation document asks for insight into where development should be directed, together with the impacts of High Speed Rail 2 (HS2), and economic growth.
- 1.6 As set out in the following representations, St Philips conclude that housing and economic growth are intrinsically linked, with each requiring the continued growth of the other to support future communities and sustained growth within the Borough. St Philips is therefore supportive of an approach that seeks to direct development to Brownfield sites in the first instance. However, as recognised in the Eccleshall Parish Neighbourhood Development Plan these are a finite resource across the Borough, which will result in a need for the release of Greenfield sites. In line with the National Planning Policy Framework 2018, the release of Green Belt sites should only be considered in exceptional circumstances.
- 1.7 In this context, St Philips wishes to promote the land east of Castle Street to deliver up to 20 residential dwellings within the first five years of the new Local Plan period.
- 1.8 The opportunities provided by the site are set out in full in the Vision Document submitted in support of these representations. This has been informed by a suite of technical evidence and also contains a Concept Masterplan which demonstrates how the site could come forward.
- 1.9 These representations respond to selected questions raised through the initial 'Scoping the Issues' report as published by the Council on 18 July 2018. Responses are provided to those questions St Philips feels are the most critical to the Plan preparation process.
- 1.10 The site, together with supporting technical evidence was submitted within the Council's latest Call for Sites consultation exercise, which took place between December 2017 – January 2018.

- 1.11 It should be noted that St Philips have submitted further representations in response to the Council's New Local Plan: Settlement Assessment and Settlement Profiles consultation.

- 1.12 The site is therefore commended to the Council for residential development and allocation within Stafford Borough Council's emerging Local Plan document to support future growth within the Borough. The relevant forms requested by the Council have also been submitted alongside this document.

2. Response to 'Scoping the Issues'

2.1 The section outlines the relevant questions addressed by the client and their response.

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

2.2 Key outcomes that the Local Plan should include the right amount and mix of homes across a variety of locations within the Borough. This will be underpinned through the identification of the Borough's objectively assessed housing need, which will be determined through the Strategic Housing and Economic Land Availability Assessment and the introduction of the Government's standardised methodology for calculating objectively assessed housing need that is embodied within the revised National Planning Policy Framework 2018 (NPPF 2018).

2.3 The results of the Standard OAN, published as part of the draft Revised National Planning Policy Framework 2018 consultation process, provides a base line for Local Planning Authorities preparing new Local Plans. In the context of Stafford, this equates to 424 dwellings per annum

2.4 Notwithstanding this position, a review of the Standardised OAN results is expected in November 2018 following the publication of household projections from the Office for National Statistics.

2.5 The Local Plan will need to implement that outcome of the revised Standard Methodology assessment with regard to the level of housing growth and this should be reflected within the emerging document. In this respect, the emerging plan will need to comply with paragraph 33 of the NPPF which advises that;

"Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future."

2.6 The emerging Local Plan and policies for the supply of housing and those relevant to settlement boundaries should therefore be prepared flexibly, with suitable wording to ensure that these can be amended to reflect changing housing needs throughout the plan period and with a specific rolling review mechanism at least every 5 years.

2.7 The emerging Local Plan will also be required to direct housing growth appropriately, in line with the Settlement Hierarchy. Development will therefore be directed to the larger settlements of Stafford and Stone in the first instance, followed by larger market towns and villages, including Eccleshall. Thus, new policies relating to housing should reflect this direction of growth and how it will be supported.

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighbourhood to make it a better place to live?

- 2.8 To ensure the creation of better places to live, work and play, local neighbourhoods are required to provide the right level of homes to support existing and future residents. This is supported through the Government's Housing White Paper, which was published in February 2017.
- 2.9 The Housing White Paper sets out new measures to speed up the supply of new housing and sets out that housing delivery has not kept up with population growth which has resulted in years of undersupply. A need for 300,000 new dwellings per annum by 2020 is subsequently identified.
- 2.10 In addition, the Government published the Revised National Planning Policy Framework in July 2018, which sets out at Paragraph 59 that:
- "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."*
- 2.11 Stafford Borough Council's new Local Plan seeks to support the Government's agenda to meet the national housing shortage through the delivery of new dwellings and subsequent employment opportunities across a number of settlements within the administrative area. This will include directing development to Stafford and Stone, the two main settlements within the Borough, followed by Key Service Villages (KSVs) as identified in the existing Local Plan
- 2.12 St Philips has reviewed the proposed Settlement Hierarchy and agree, in principle, with the way in which development will be directed. Notwithstanding this position, the Developers wish to object to the status of Eccleshall within Settlement Hierarchy.
- 2.13 In this respect, as the Council will be aware Eccleshall is a town rather than a village and this should be reflected within the emerging Local Plan.
- 2.14 The settlements key role is demonstrated within the consultation document Settlement Assessment and Settlement Profile Consultation. In this respect, given the town's size, population and household, accessibility to employment and accessibility to shops, facilities and amenities, Eccleshall clearly performs a more important role within the Borough than that of a village.
- 2.15 It is therefore recommended that the status of Eccleshall should be elevated. This is recognised in paragraph 4.14 of the consultation document (New Local Plan Settlement Assessment) where parallels are drawn between itself, Stone, Stafford and the North Staffordshire Urban Area due to the *"range of retail, employment, education and community services, also referred to as the 'main settlements'"*.
- 2.16 In this respect, St Philips recommends that another category be added to the hierarchy: 'Market Towns'. This should aim to accurately reflect the role of the town and subsequent policy wording should ensure that the

right level of growth proportionate to the settlements size and scale will be reflected within emerging policies.

Question 4

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

- 2.17 Our client agrees, in principle, with the proposed strategy to promote development through the Sustainable Settlement Hierarchy, currently adopted within the existing Local Plan. Under the existing hierarchy development will be directed to Stafford in the first instance, followed by Stone, before the 17 Key Service Villages.
- 2.18 The revised hierarchy directs growth as follows:
- Stafford;
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 - Medium Villages (250 + dwellings); and
 - Small Villages (50+ dwellings).
- 2.19 However, as set out in the response to question 3 St Philips wish to object to the status of Eccleshall within the Settlement Hierarchy. In this respect, as the Council will be aware Eccleshall is a town rather than a village and this should be reflected within the emerging Local Plan.
- 2.20 The settlements key role is demonstrated within the consultation document Settlement Assessment and Settlement Profile Consultation. Thus, given the town's size, population and household, accessibility to employment and accessibility to shops, facilities and amenities, Eccleshall clearly performs a more important role within the Borough than that of a village.
- 2.21 It is therefore recommended that the status of Eccleshall should be elevated. This is recognised in paragraph 4.14 of the consultation document (New Local Plan Settlement Assessment) where parallels are drawn between itself, Stone, Stafford and the North Staffordshire Urban Area due to the *"range of retail, employment, education and community services, also referred to as the 'main settlements'"*.
- 2.22 In this respect, St Philips recommends that another category be added to the hierarchy: 'Market Towns'. This should aim to accurately reflect the role of the town and subsequent policy wording should ensure that the right level of growth proportionate to the settlements size and scale will be reflected within emerging policies.
- 2.23 St Philips therefore recommend that the revised settlement hierarchy directs growth as follows:
- Stafford;
 - Stone;
 - North Staffordshire Urban Area;

- Market Towns including Eccleshall;
 - Large Villages (500+ dwellings);
 - Medium Villages (250 + dwellings); and
 - Small Villages (50+ dwellings).
- 2.24 In terms of delivering land for new housing the land at Castle Street is located on Greenfield land adjacent to the settlement boundary of Eccleshall and comprises the land east of Castle Street, as demonstrated in the site plan included in the Vision Document submitted as part of these representations. The site is well bound by a tributary to the River Sow in the north, existing development and agricultural land to the east, the existing settlement boundary to the south, and Castle Street to the west. The result of these defensible boundaries will reduce future development pressures and the further expansion of the town in this location.
- 2.25 The site represents a sustainable location for development in relation to the rest the village inasmuch that amenities, facilities and opportunities to utilise public transport can be realised from the site access point. Furthermore, the site provides an opportunity to meet one of the aspirations of the Parish Neighbourhood Development Plan, as set out on Page 12 and 13 of the document. In this respect the masterplan proposes to deliver a Country Park and riverside walk along the banks of a tributary to the River Sow. Thus, enhancing the provision of open space within the existing community.
- 2.26 It is considered that the extension of the Settlement Boundary in this location provides an opportunity to deliver up to 20 residential dwelling, to support the growth of the Borough in a self-contained land parcel. As detailed, the site provides clear defensible boundaries which would serve to restrict the future growth of the settlement in this area.

Question 5

Do you consider that the new Local Plan should set out a range for densities for the Borough and if so, are there any specific locations?

- 2.27 Where appropriate, density guidance should be provided within the emerging policies of the new Local Plan. In this context, specific regard should be had to Stafford, Stone, and the North Staffordshire Urban Areas (as per the proposed Settlement Hierarchy) as development densities in these locations are anticipated to be much higher than those in rural areas. It is therefore suggested that a minimum density of 30 dwellings per hectare should be applied to these areas.
- 2.28 For all other settlements and proposed locations for development within the Borough, including Large Villages, Medium Villages and Small Villages (as per the proposed Settlement Hierarchy), it is considered that the density of development should be informed by the existing character and layout of the surrounding areas, housing needs, and accessibility to local services. Such locations should therefore be considered on a case by case basis.
- 2.29 In the context of the proposed development site, it is acknowledged that the density will be relatively low, at 8 dwellings per hectare. However, this affords the opportunity to provide a Country Park in line with the aspirations of the Eccleshall Parish Neighbourhood Development Plan, whilst maintaining a rural, soft edge to

the settlement boundary and existing landscaping views from surrounding footpaths and the scheduled ancient monument comprising the castle.

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

- 2.30 Paragraph 117 of the Revised National Planning Policy Framework 2018 sets out that *“planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much as use as possible of previously-developed or ‘brownfield’ land.”*
- 2.31 Furthermore, Chapter 13 of the new Framework affords great importance to the retention, protection and enhancement of designated Green Belts, noting that the fundamental aim of Green Belt policy is *“to prevent urban sprawl by keeping land permanently open.”*
- 2.32 Paragraph 143 states that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”*
- 2.33 Therefore, should the Council not be able to find enough suitable Brownfield sites to meet housing and employment need across the Borough, they should seek to direct development to alternative, Greenfield sites, which do not harm or interfere with Stafford’s defined Green Belt.
- 2.34 As demonstrated throughout the supporting Vision Document the proposed development site, whilst not Brownfield, presents a sustainable development option which is available and deliverable now to support housing needs within the Borough. The Vision Document clearly sets out the self-contained nature of the site, its proximity to local services and amenities, together with public transport opportunities.
- 2.35 Most importantly, the site does not require release from the Green Belt and will be supported a landscape strategy to ensure the rural character of Eccleshall is maintained and enhanced, where appropriate.

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self-build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

- 2.36 Our client is supportive, in principle, that a percentage of large sites should make available land to accommodate those listed on the Stafford Borough Self-build and Custom Housebuilding Register. At present there are currently 26 individuals with a registered interest requiring a variety of plot sizes in numerous locations across the Borough. Of the 26 registered, 14 have expressed an interest in self-build plots in Eccleshall, equating to approximately 4.02 hectares.

- 2.37 It is considered that whilst the existing register demonstrates only a low number of individuals interested in obtaining land for self-build and custom build dwellings, this could increase following the adoption of the plan. Therefore, the introduction of a policy that requires sites of over 20 dwellings or more to accommodate the need, where applicable, would ensure the land is safeguarded for this use.

Question 10

What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

- 2.38 It is clearly demonstrated through both national and local planning policy that a key barrier to employment growth includes the provision of housing. Namely, the Government's Housing White Paper: Fixing our broken housing market, published in February 2017, sets out that *"to boost housing supply and, over the long term, inter alia, a more efficient housing market whose outcomes more closely match the needs and aspirations of all households and which support wider economic prosperity [is required]."*
- 2.39 The White Paper sets out that as a result of not enough Local Authorities planning for the homes they need; house building being too slow; and the construction industry being too reliant on a small number of big players, there has been a significant under-delivery of new homes since the 1970s and house building has struggled to keep up with population growth.
- 2.40 Consequently, *"sky-high property prices stop people moving to where jobs are"*, together with *"low levels of housing building mean[ing] less work for everyone involved in the construction industry, inter alia, meaning less money gets spent in the wider economy."*
- 2.41 The Revised NPPF 2018 further supports this, most notably at Paragraph 8, which sets out the three strands underpinning sustainable development, including objectives relating to the economic role; social role; and environmental role of development. The NPPF recognises that these overarching objectives are *"interdependent and need to be pursued in mutually supportive ways"* and they will be delivered through the preparation and implementation of plans.
- 2.42 Thus, the delivery of new housing and the benefits that are afforded as a result of new development are intrinsically linked to the success of economic growth. In this context, the proposed development site would seek to provide a variety of economic benefits, namely the provision of both direct and indirect/supply chain construction jobs and during its operational lifetime through its resident population.
- 2.43 The table overleaf sets out the anticipated yield of employment opportunities based on a development of 20 dwellings with an average population size of 2.3 residents.

Construction	
Construction Phase ¹	20 x 1.2 = 10
Indirect / Induced Supply Chain Multiplier ²	20 x 1.51 = 30.2
Indirect / Induced Employment Multiplier ³	20 x 0.64 = 13
Operational	
Proposed number of residents	20 x 2.3 = 46
Population of working age ⁴	83.1% of 46 = 38 people
Economically active ⁵	88.6% of 38 = 34 people
Total employed ⁶	79.8% of 46 = 37
Employees in 'Major Group 1-3' ⁷	45.6% of 37 = 17

2.44 The figures within the table above demonstrate the economic benefits of the proposed development in terms of both economic prosperity and housing growth.

Question 16

What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?

2.45 It is recognised that the Eccleshall Parish Neighbourhood Development Plan establishes five aspirations to be delivered through future development proposals, including:

- Road infrastructure around the town or an alternative route for heavy goods vehicles;
- Improvements to parking facilities within the town;
- Riverside Country Park area alongside the River Sow;
- Footpath on Chester Road to Pershall and the Football Club; and
- Central reservation and crossing point on Stone Road.

¹ The HBF's report 'The Economic Footprint of House Building in England and Wales' sets out that 3.1 jobs are created per dwelling. For every direct job, 1.51 indirect and induced jobs are also created. We have therefore assumed that from the total of 3.1 jobs per dwelling, 1.2 is attributed to direct job creation.

² For the purpose of these calculations we have used the figures calculated by the CEBR's report for the NHF which identifies a multiplier of 2.51, which indicates that for every 1 direct construction job, 1.51 indirect and induced jobs are created elsewhere in the supply chain and wider UK economy.

³ Barratt Developments' 2017 Socio-Economic Footprint identifies an induced employment multiplier of 1.64 indicating that for every 1 direct job created, 0.64 induced jobs are created elsewhere. This could involve employment opportunities supported by wage-spending of construction and supply chain workers in shops, services and other businesses.

⁴ Census 2011

⁵ 88.6% of working age population (Census, 2011)

⁶ 79.8% of working age population (Census, 2011)

⁷ 45.6% of employed population (Census, 2011)

- 2.46 The Plan sets out that there is little open space in Eccleshall for a town of its size when compared to smaller surrounding villages which have publically maintained open space, supporting the provision of parkland and play facilities.
- 2.47 In order to help overcome this deficit, a Country Park to provide a walk along the bank of the River Sow is suggested as an aspiration to facilitate existing demand.
- 2.48 In response to these aspirations, the comprehensive Vision Document and masterplan for the land at Castle Street submitted alongside these representations and the SHLAA, has sought to retain a large proportion of the land within the boundary as a Country Park. Whilst this borders a tributary of the River Sow, it is considered that a link could be provided to enable the space to connect to the permissive Eccleshall Walk 8 route and subsequently provide riverside public access. In addition, an area of formal play will be located within this area of open space, together with informal play opportunities.
- 2.49 The proposals would therefore accord fully with the aspirations of the Neighbourhood Development Plan whilst also seeking to improve accessibility and enhance the provision of open space and leisure facilities within the Borough, whilst supporting leisure facilities to meet the needs of the emerging Local Plan.

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

- 2.50 It is St Philips view, that any potential development sites that are being considered as an allocation within the emerging Local Plan should be considered in light of their location and accessibility to amenities, facilities and services, together with sustainable transport opportunities. By their virtue, this would lead to a reduction in issues relating to pollution and air quality, ensuring that adverse impacts are minimised.
- 2.51 As demonstrated in the supporting Vision Document, the land at Castle Street is located on the edge of Eccleshall outside of the existing Settlement Boundary. The site is located approximately 200m to the north-east of the main high street and town centre.
- 2.52 A 2m footway is provided along the western side of Castle Street, whilst footways are provided on both sides of the highways circa. 100m to the south of the site.
- 2.53 St Philips have commissioned a Transport Assessment for the proposed development site. This demonstrates that the site is located in close proximity to a number of facilities and amenities, including a supermarket, GP Surgery and Pharmacy, Post Office and Primary School. These are all located within a 10 minute walk of the site, as summarised in the table overleaf.

Amenity	Distance from the Site (km)	Walking Time (Minutes)
Co-op Supermarket	0.2	3
Post Office / Local Shop	0.2	3
Pharmacy	0.2	3
Nisa Supermarket	0.3	4
Doctors Surgery	0.3	4
Eccleshall High Street (Café/Cash Machine/Library)	0.3	4
Bishop Lonsdale Primary School	0.8	10

2.54 The nearest bus stops are located on Castle Street, immediately opposite the site, which provides northbound services. Another bus stop is located circa. 75m south of the site and provides southbound services. The table below summarises local bus provision from these services.

Service No.	Operator	Route	Days of Operation	Weekday Frequency
12	D&G Coach and Bus	Fulford – Stone	Weekdays and Saturday	One per AM and PM peak
13A	D&G Coach and Bus	Stafford – Swynnerton	Weekdays and Saturday	One per AM and PM peak
14	D&G Coach and Bus	Hanley – Stafford	Weekdays and Saturday	One per hour (06.55 – 19.40)
14A	D&G Coach and Bus	Hanley – Eccleshall	Weekdays	Designated School Bus for AM and PM
15	D&G Coach and Bus	Stone – Swynnerton	Weekdays	One per AM and PM peak (also a school route)
15A	D&G Coach and Bus	Stone – Market Drayton	Weekdays	One per AM and PM peak (also a school route)
15B	D&G Coach and Bus	Stone – Norbury	Weekdays	One per AM and PM peak (also a

	Bus			school route)
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- 2.55 There are multiple services provided from Stone, including services reserved for school pupils who may need to access secondary schools. In addition, Service 14 provides hourly connections to Stafford with journeys taking approximately 20 minutes.

- 2.56 The nearest rail station is located in Stafford and can be accessed from the site via the number 14 bus service in approximately 20 minutes. Rail services include:
 - 3 per hour to Birmingham New Street;
 - 3 per hour to Liverpool;
 - 2 per hour to London Euston;
 - 2 per hour to Manchester;
 - 1 per hour to Bournemouth; and
 - 1 per hour to Bristol.

- 2.57 It is noted that Stafford Railway Station will become a hub station to for HS2. Namely, the ‘Stafford Station Gateway Masterplan’ proposes the development of land near to the railway station will include up to 650 apartments, 150 dwelling houses, a multi-storey car park and leisure facilities.

- 2.58 HS2 aims to reduce journey times to London from one hour fifty five minutes to fifty minutes.

- 2.59 It can therefore be demonstrated that the land at Castle Street is well connected to the surrounding highway network and is conveniently located to existing key amenities which are within a reasonable walking distance to serve future residents. The site is served by pedestrian links, together with bus services to nearby major centres, including Stone, Stafford and Stoke-on-Trent.

- 2.60 It is therefore considered that development at the site would seek to reduce the impacts relating to pollution and air quality, thus affording a highly sustainable development site.

Question 25

National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standard of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex of sensitive development proposals?

- 2.61 It is St Philips position that, where applicable, a local design panel should be established and engaged to support the on-going masterplanning of potential development sites, where they are of a major scale, are particularly complex, or are sensitive in nature.

- 2.62 St Philips consider it critical however that any such Design Panel should be fully accessible to the planning application process and that the potential for delay minimised. It is also important that any Design Panel Reviews are undertaken alongside the consideration of key technical matters to ensure that these are positively considered in light of the wider site opportunities and constraints.

Question 29

The NPPF states that Green Belt boundaries should only be review in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

- 2.63 Land should only be released from the Green Belt in the event that other Brownfield or non-Green Belt land is not available.
- 2.64 In this respect, the land at Castle Street is comprised solely of Greenfield land and demonstrates a sustainable opportunity adjacent to the settlement boundary of Eccleshall to accommodate the future growth of the Borough without the need to release additional Green Belt land.

3. Conclusion

- 3.1 These representations have been made on behalf of our client, St Philips, and form their response to the Stafford Borough Council Local Plan "Scoping the Issues" consultation.
- 3.2 St Philips welcome the review of the extant Development Plan, including the Plan for Stafford Part 1 and 2 and the proactive approach taken by the Council to ensure the framework is up-to-date.
- 3.3 St Philips supports the intention to address housing need through Brownfield sites, in the first instance, followed by Greenfield sites. However, the finite resource that are Brownfield sites should be accommodated within the future planning policies for the Borough. Notwithstanding this, emerging policies should also seek to recognise the national planning policy agenda which seeks to ensure delivery of sufficient new homes to meet need defined within the Standard Methodology.
- 3.4 The Vision Document submitted in support of these representations demonstrates that the land east of Castle Street is a sustainable location and that the site could, crucially, deliver development within the first five years of the new Local Plan period, helping the Borough meet its identified housing targets.
- 3.5 St Philips hopes that Stafford Borough Council realise the potential opportunities afforded to the site and wish to be informed of the on-going progress of the emerging Local Plan. We welcome future opportunities to make representations to forthcoming consultations.
- 3.6 We welcome continued dialogue with the relevant planning policy officers at Stafford Borough Council.

Contact Details





CASTLE STREET

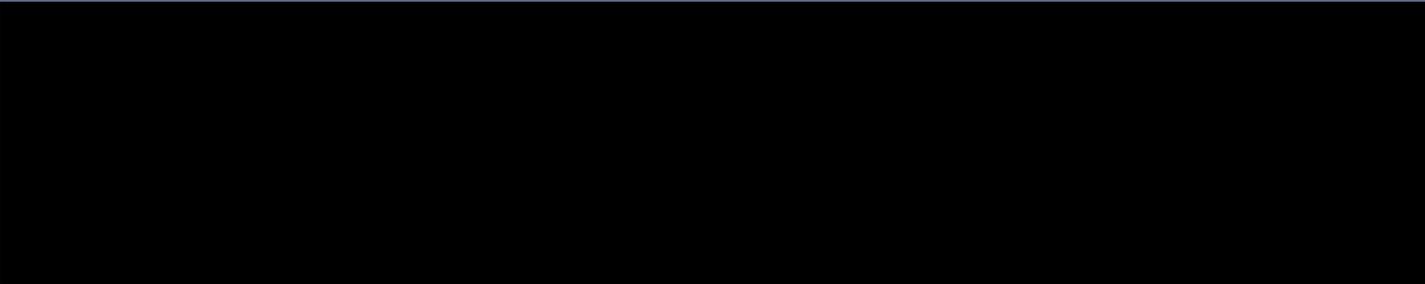
- Eccleshall -

Vision Document | January 2018



ST PHILIPS

*St Philips is the new name for UK
Land Development*



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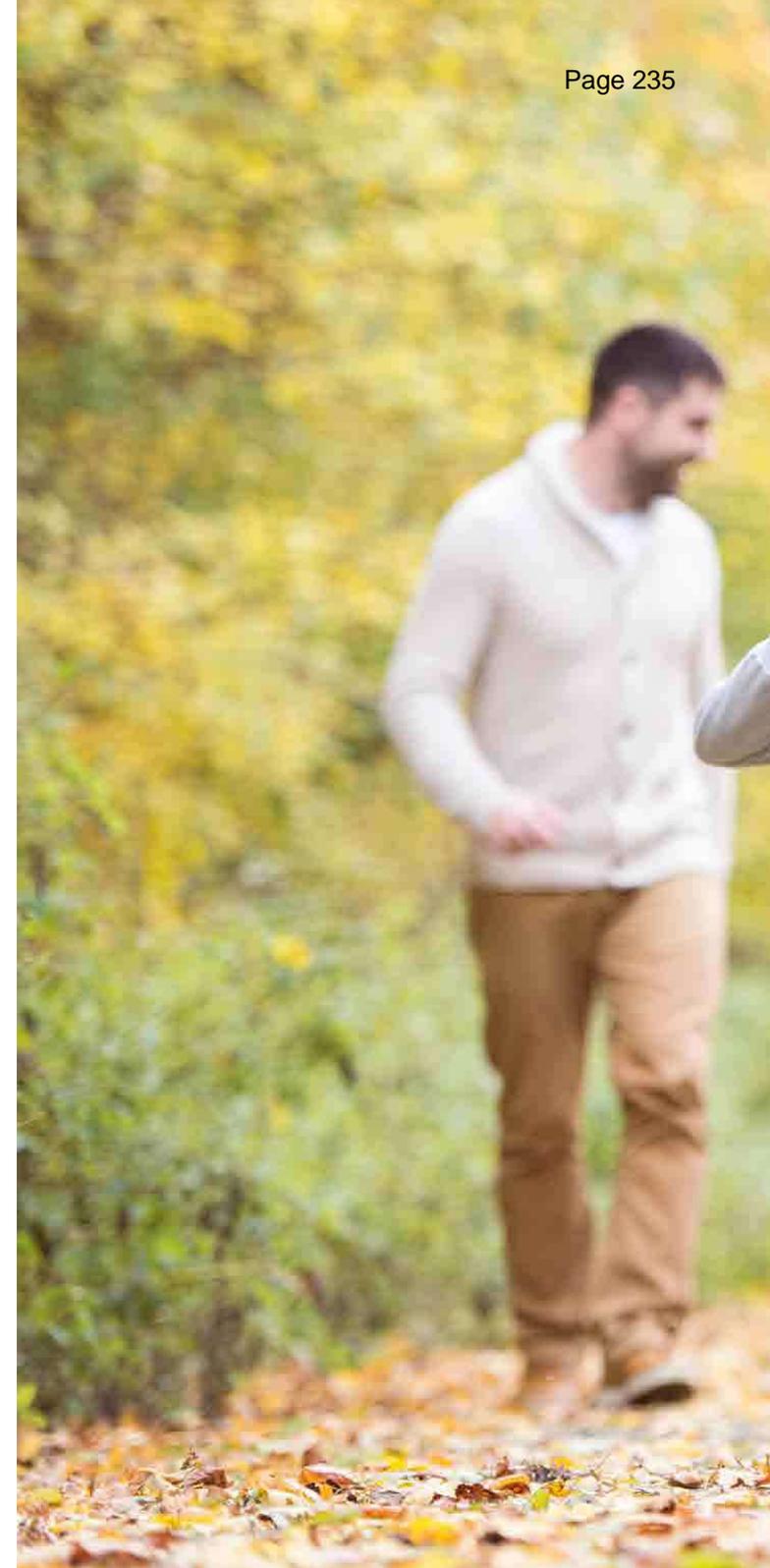
The Vision

The proposals for Castle Street, Eccleshall will ensure the creation of an attractive and high-quality development where people aspire to live, celebrating the exiting landscape assets of the site and its immediate setting.

The site will bring forward additional land immediately adjacent to the existing strategic allocation at Castle Street to deliver new homes to meet the future needs of Eccleshall.

Our key aspirations for the site are:

- » Create a **distinctive identity** for the development of the site, that responds to the positive elements of the existing built form of Eccleshall and ensures a successful and attractive fit into the local setting.
- » Deliver housing in a location that benefits from a **sustainable location**, close to key village facilities.
- » Promote **community cohesion** through the provision of high quality, safe places for interaction that benefit both the new and existing community.
- » Inspire well-being through the provision of new, attractive **multifunctional green-infrastructure and country park**, encouraging physical exercise and healthy lifestyles choices.





I. Introduction

The Site

This Vision Document has been prepared by St Philips to promote the land east of Castle Street, Eccleshall as a sustainable development proposal capable of delivering 20 new dwellings.

This document has been prepared to assist in the promotion of the site through the Stafford Borough Local Plan Review. It is acknowledged that this is the start of the process, and St Philips is committed to undertaking further technical work as required and to consult widely with the local community, including local businesses and key stakeholders, to refine and develop the strategy.

St Philips consider that the land east of Castle Street, Eccleshall should be allocated for residential development in the Stafford Borough Local Plan Review to assist in meeting the Borough's objectively assessed housing needs.

The key objectives of this Vision document are:

- » To provide an up to date assessment of the land east of Castle Street, Eccleshall that demonstrates the site is an appropriate, sustainable and deliverable location;
- » To assist further discussions with the Local Planning Authority, relevant stakeholders and the local community; and
- » To set out the vision for the site and show how this can be realised through the provision of a Concept Masterplan.

St Philips control the land to the south of the site, which has been allocated through the Eccleshall Neighbourhood Development Plan and is being brought forward for residential development, circa. 60 dwellings (referred to as “the allocated site” within this Vision Document). This document seeks to demonstrate that the site could be brought forward in conjunction with the allocation land to deliver a comprehensive development package.

Technical Assessments

In preparing the Vision document and Concept Masterplan proposal St Philips have appointed a team of consultants to advise on all matters relating to the promotion of the site. The physical, environmental and technical suitability of the site for residential development has been confirmed by the following assessments, informing the development of the Masterplan:

- » Barton Willmore – Masterplanning and Landscape
- » Phil Jones Associates – Transport and Highways
- » GVA – Planning, Flooding, Drainage and Ground
- » FPCR – Ecology and Arboriculture
- » Wardell Armstrong – Heritage and Utilities



-  Site
-  Developed Areas
-  Town Centre
-  Motorway
-  Motorway Junction
-  A Road
-  B Road
-  Railway Line
-  Railway Station
-  Watercourse
-  Waterbody
-  Canal

Wider Site Location Plan

2. Planning Policy Context

The site is located on Greenfield land adjacent to the Settlement Boundary of Eccleshall Village, Staffordshire. The Development Plan currently comprises The Plan for Stafford Borough 2011 – 2031 and The Plan for the Borough Part 2 2011 – 2031. Stafford Borough Council (SBC) adopted their Local Plan on 31 January 2017. This document provides the overarching principles that will deliver the essential development needs of the District up to 2031.

Adopted Local Plan

The Plan sets out the development framework for the District up to 2031. The Plan was adopted after the publication of the National Planning Policy Framework (NPPF) (2012) and therefore presents the housing requirement for the Borough in line with the guidance provided in the Framework. *Policy SP2 – Stafford Borough Housing and Employment Requirements* sets out a requirement for 10,000 dwellings over the Plan period, equivalent to 500 dwellings per annum. *Policy SP3 – Stafford Borough Sustainable Settlement Hierarchy* outlines that the majority of development will be delivered at the County Town of Stafford and Market Town of Stone before 11 Key Service Villages, including Eccleshall. 12% of the total housing requirement (1,200 dwellings) will be directed to the Key Service Villages.

The Plan for Stafford Part 2

The Plan for Stafford Part 2 covers the plan period 2011 – 2031. It was adopted by the Council on 31 January 2017 and sets out an approach to development in the sustainable hierarchy. It establishes settlement boundaries for Stafford, Stone and the Key Service Villages, including Eccleshall.

The Inset Map for Eccleshall identifies that the site is located outside of the Settlement Boundary and is designated as Greenfield Land. Importantly the site sits immediately north of the existing allocation at Castle Street which is designated by land included within the new settlement boundary for the town in the Part 2 Plan. . The site is not constrained by any statutory or local conservation designations.

Neighbourhood Development Plan

The Eccleshall Neighbourhood Development Plan (NDP) was adopted in July 2016 and sets out the development framework to 2031. The Plan acknowledges the Borough's commitment to deliver 10,000 dwellings during the Plan period, with 1,200 directed towards the Key Service Villages. Paragraph 6.3 sets out that there are no suitable brownfield sites within the existing boundary of Eccleshall, therefore, edge of settlement Greenfield sites have been considered for new residential development, including 3.77 Ha of land to the south of the site now being promoted. This is controlled by the same landowners as the promotion land, and represents an opportunity to bring forward additional land through a comprehensive approach to site delivery. As part of this there is an opportunity for site wide

masterplanning, access to the River Sow, and the development of a natural boundary for development.

The Eccleshall NDP sets out a list of 5 aspirations which the Parish Council would like to see delivered during the Plan period. Whilst these are not planning policies, the Parish feel the delivery of such community facilities would enhance and preserve the character of Eccleshall village and the wider Parish.

The aspirations included within the Eccleshall NDP include:

- » Road infrastructure around the village or an alternative route for heavy goods vehicles;
- » Improvements to parking facilities within the village;
- » Riverside Country Park area alongside the River Sow;
- » Footpath on Chester Road to Pershall and the Football Club; and

- » Central Reservation and crossing point on Stone Road.

Development of the site for residential uses would be supported by the delivery of a Country Park, thereby fulfilling one of the aspirations contained within the NDP. The site would secure the release of an additional area of land north of the exiting allocation at Castle Street and would secure the comprehensive development of land up to the boundary with the River Sow.

Importantly, the site would ensure a permanent buffer to future development pressure and opportunities to deliver a Country Park, which would be offered for public ownership as part of the delivery of policy compliant open space.

Emerging Local Plan

Stafford Borough Council initiated their Local Plan Review in July 2017. This will replace the adopted Plan for Stafford Borough Part 2011 – 2031 and the Plan for Stafford Borough Part 2 (2011 – 2031). The

Council are currently undertaking a Call for Sites exercise, which this document responds to.

Call for Sites

Stafford Borough Council undertook a Call for Sites consultation as part of the preparation of its emerging Plan for Stafford Borough Part 2 between 2015 and 2017.

The site was submitted in conjunction with land to the south of the site and a parcel of land located west of Castle. The Council's response can be found within the report titled 'Strategic Housing Land Availability Assessment 2015'.

At the time, the Council's position was that development of the site was not suitable due to its location outside of the sustainable settlement boundary, albeit adjacent to the Settlement Edge. In addition, flooding constraints were considered a restriction to development, however, as this document demonstrates, with appropriate measures it is considered that these constraints can be mitigated.

This document sets out the opportunity of the site now in light of recent technical information that

supports its development and promotion in the Stafford Borough Local Plan Review.

Five Year Housing Land Supply

The Stafford Borough Plan outlines a requirement for 10,000 dwellings over the Plan period to 2031, equating to 500 dwellings per annum. The latest Authority Monitoring Report (2016) outlines that the Borough under-provided for the first four years since 2011, however, far exceeded this in the fifth and sixth year (+188 and +501, respectively). With this in mind, the report concludes that the council can demonstrate a housing land supply of 6.76 years under the Sedgfield method and 7.02 years under the Liverpool method.

Table 1. Five Year Housing Land Supply Assessment

Annualised requirement	600
Shortfall	337
Supply	3,509
5 Year Requirement	3,000
5 Year Residual and Shortfall	3,337
Residual Annual Requirement	6,667
	5.3 years

Notwithstanding this, we have reviewed the housing land supply position, below:

In light of this, we have applied a lapse rate, or discount for non-deliver 10%¹ which reduces the supply further to 4.7 years. We would therefore suggest that there is a need for Stafford Borough to continually identify and update a supply of specific deliverable sites sufficient to provide need land for housing to meet their housing.

The site provides the opportunity to release an additional area of land to accommodate approximately 20 further dwellings above the current allocation which will meet the growth needs of the Borough.

¹ A lapse rate of 10% has been applied as per Stafford Borough 5 Year Housing Land Supply Statement (March 2017), which utilises the same rate.





-  Site boundary
-  Allocated site
-  Approximate Settlement Boundary:
Stafford Borough Council, Eccleshall
Inset Map 9

3. Assessing the Context: Local

3.1. Access and Movement

The site is well connected to the surrounding urban area, with easy access to public transport services and strategic highway links. The plan opposite shows the location of the site within the context of the local access and movement network.

Walking and Cycling

The site is well situated with access to the Public Rights of Way (PRoW) Network available via Eccleshall Footpath 12 to the west, and Footpath 6 to the north of the site. A permissive path runs to the north of the River Sow and the northern site boundary, featured in the Eccleshall Parish Council Favourite Walks booklet.

Public Transport

Bus stops are located on Castle Street to the west of the site and offer regular bus services to Stafford and Stone and Hanley, and daily services to Newport and Stoke-on-Trent.

Stone and Stafford rail stations are located 11km north-east and 12km south-east of the site respectively, and offer regular train services to Manchester, Liverpool, Birmingham and London.

Highway Network

The site is located on the eastern side of the A519 (Castle Street), which enters Eccleshall village centre approximately 200m to the south. A footway is provided on the western side of the carriageway.

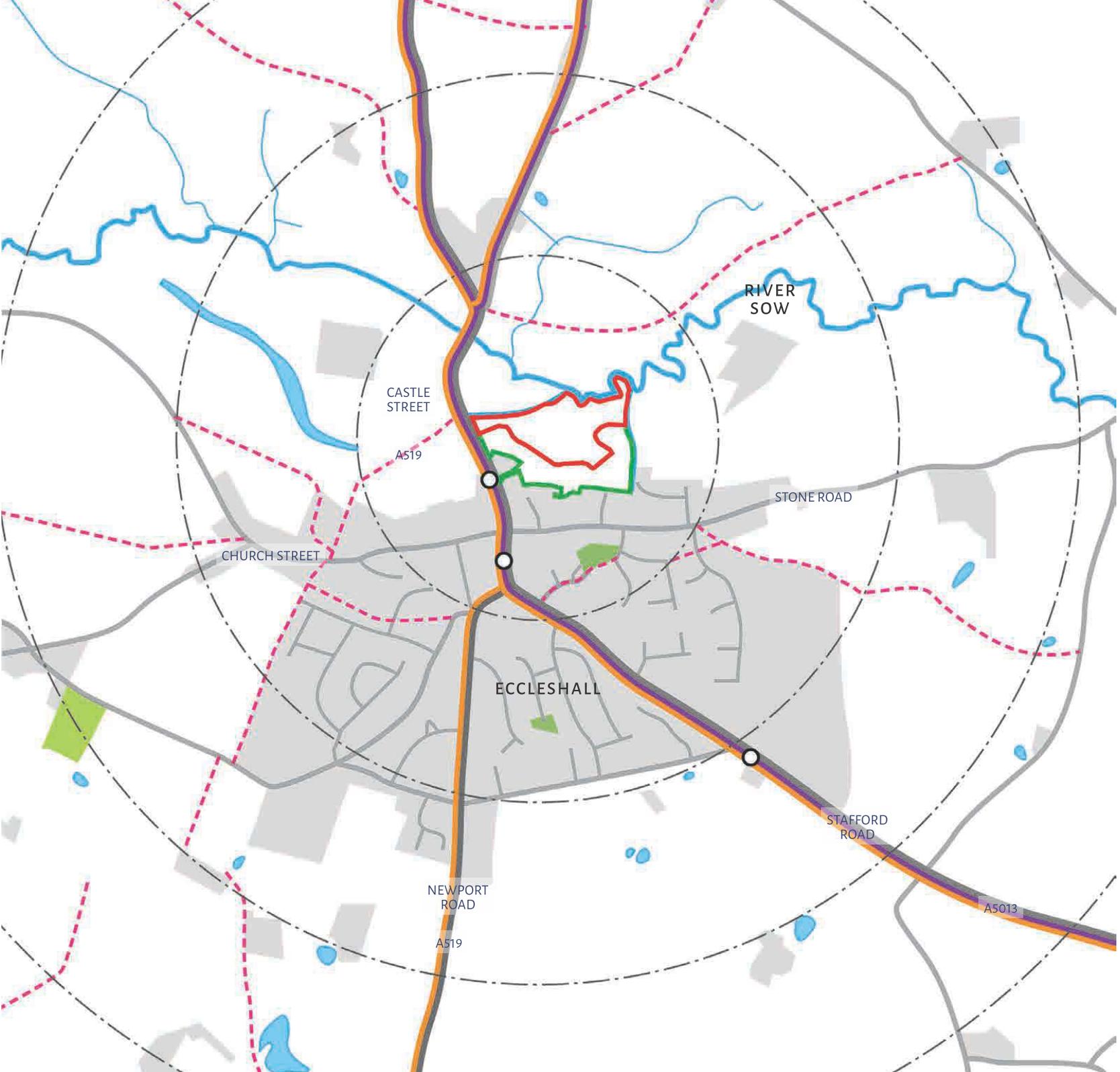
The M6 Junction 14 is located 8km south-east of Eccleshall providing links to the strategic highway network.



Local bus routes serve Castle Street, adjacent to the sites western boundary.



PRoW Eccleshall 6 Footpath to the north of the River Sow and the site



- Site
- Allocated Site
- Developed Areas
- Local Centre
- A Road
- B/ Minor Road
- Existing Bus Stop
- Bus Route 14
- Bus Route 15/ 15A/ 15B
- PROW: Footpath
- Woodland
- Green Space
- Allotments
- Watercourse
- Waterbody

Access and Movement Plan

3.2. Local Facilities

The site is well positioned in terms of access to local facilities and services, as shown on the plan opposite, which includes indicative isochrones of 200m (approximately a 2-minutes' walk)

The site is a short walk to the north of Eccleshall village centre which offers a range of local facilities and services, including food and non-food retail, a GP surgery, a pharmacy and a post office.

Education

The nearest primary school is Bishop Lonsdale C of E Primary School, approximately 1km (a 15-minute walk) to the south-west of the site. Further to this, secondary school bus services are also provided in the vicinity of the site to schools in Stone and Stafford.

Health

The nearest pharmacy and GP surgery are located on Eccleshall High Street, a 130m and 200m walk south east of the site respectively.

Recreation

Formal sports facilities are provided within Eccleshall village; Eccleshall Tennis Club and Cricket Club are located 750m (approximately a 10 minute walk) west of the site.



Eccleshall village hosts many local independent shops



Supermarket in Eccleshall village centre, 180m walk south of the site



- Site
- Allocated Site
- Developed Areas
- Local Centre
- A Road
- B/ Minor Road
- Bus Route
- Bus Stops
- PROW: Footpath
- Library
- Doctors
- Dentist
- Pharmacy
- Post Office
- Nursery
- Primary School
- Woodland
- Green Space
- Watercourse
- Waterbody

Local Facilities Plan



View west along Eccleshall High Street.



THE ARCADE
at
12 HIGH STREET

Little Monsters
of Ecclesham
01785 851189

katharine house

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3.3. Landscape Character: Key attributes in National and Local Assessments

The landscape character assessment approach is a descriptive approach that seeks to identify and define the distinct character of landscapes that make up the country.

This approach recognises the intrinsic value of all landscapes, not just ‘special’ landscapes, as contributing factors in people’s quality of life, in accordance with the European Landscape Convention. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF Core Principles.

The description of each landscape is used for a basis for evaluation in order to make judgements to guide, for example, development or landscape management.

National Character Area 61: Shropshire, Cheshire and Staffordshire Plain

Landscape Character Assessment at a National Level of study defines attributes and qualities in the landscape that are discernible at a high level of study. These regional character prompting attributes

are not general but they are broad and wide ranging and include patterns in landform and geology; land use; tree cover; and in settlement. The site and the village of Eccleshall are both located within National Character Area (NCA) 61: Shropshire, Cheshire and Staffordshire Plain. This NCA covers an extensive area from Chester in the north down to Shrewsbury in the south and comprises of gently undulating, pastoral farmland scattered with large farmsteads, dispersed hamlets, market towns and is crossed by an extensive transport and river network.

The NCA study stops at the settlement edge, where and domestication and the urban nature of the settlement do influence the landscape character. NCA 61 is a strongly rural area however and the scale and depth of the countryside bring clear influences throughout the landscape.

Staffordshire Landscape Character Assessment

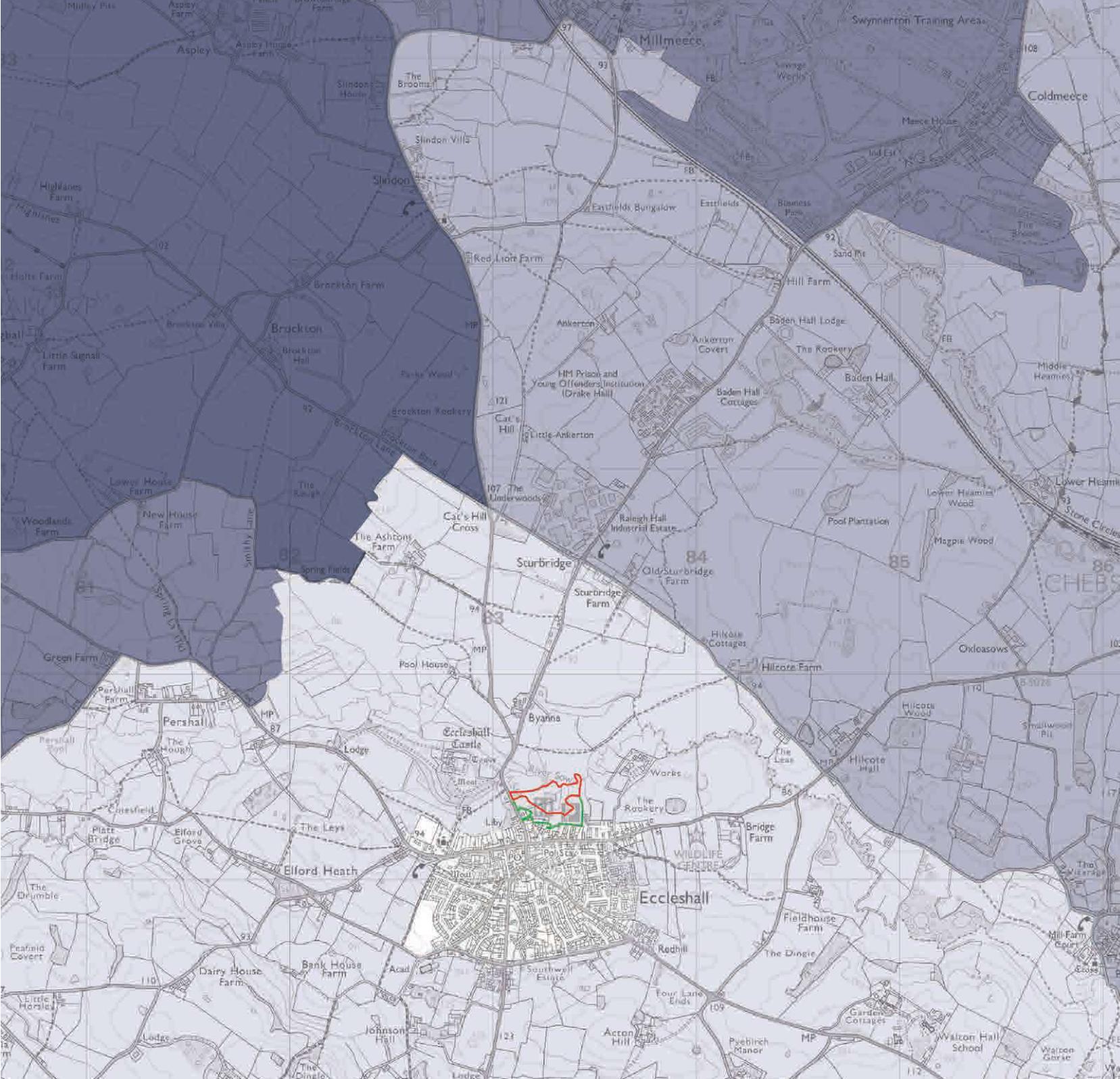
The Staffordshire Landscape Character Assessment (SLCA) adopted in 2001 has looked at landscape character at a more detailed level of study. The SLCA places the site within the ‘Ancient Clay Farmlands’ Landscape Character Type. The LCT is characterised by a mix of arable and pastoral farmland that have an irregular pattern of hedged fields partitioned by ancient hedgerows and oak trees. The mature

hedgerow oaks are characteristic of this landscape and are numerous in places; enough to stand in groups and to coalesce visually, and to interrupt long views across the landscape. In more intensively farmed, predominantly arable areas these intensive farming practices have resulted in the removal of many hedgerows and the fields are larger and the landscape more open.

The gently rolling landform, with occasional high points, frequently allows long distance views over the landscape. Local small scale ancient woodlands and plantations provide areas of denser visual containment.

The SLCA sets specific guidelines for landscape conservation and enhancement within the LCT:

- » “Increase planting of hedgerow trees and field corners to rebuild the structure of the landscape where decline is occurring;
- » Plant new woodlands to adhere to existing field pattern and to reflect the scale of the landscape;
- » Respect the existing broadleaved character of the landscape in any new planting proposals...;
- » Stream corridors could be reinforced with additional linear planting of waterside species.



Site

Allocated Site

Staffordshire Landscape Character Assessment (1996-2011)

Landscape Character Types

Ancient Clay Farmlands

Settled Farmlands

Sandstone Hills and Heaths

Settled Plateau Farmland Slopes

Staffordshire Landscape Character Assessment.
Landscape Character Type:
'Ancient Clay Farmlands'



View south from Bryanna Farm towards the site and properties on Cherry Tree Close



4. Assessing the Context: The Site

4.1. Access

The eastern side of Castle Street provides a suitable frontage for a new vehicular access.

A review of speed survey data demonstrates that the required visibility for a new access can be achieved in both directions, with visibility splays located wholly within highway land, land within the owners control, or the allocated site.

There are no footways on the eastern side of Castle Street along the site frontage. A footway is provided on the western side of the carriageway opposite the site, and on the eastern side a footway commences approximately 30m south of the site boundary.

A central refuge will be provided on Castle Street to allow pedestrians to cross to the footway on the western side of the carriageway. A further pedestrian access will be provided at the south-western boundary of the allocated site to join a new footway within the verge on the eastern side of the carriageway leading towards the town centre.

The site is only a few minutes walk to the north of the town centre and is served by a regular bus service, it is therefore considered that there is good potential for sustainable travel to and from the site.



Potential pedestrian access point from A519 (Castle Street) at the south west of the site.



View north along the A519 (Castle Street) to the proposed site vehicular access location

4.2. Hydrology and Drainage

The River Sow flows along the northern site boundary. There are two land drains that converge with the River Sow, located along the eastern and north-western site boundaries. A minimum easement of 8m to the river and 5m to the land drains will be incorporated into any proposals.

The current Environment Agency flood maps show that majority of the central and northern portion of the site is located within Flood Zone 2, and as such, there is between 0.1% and 1% chance of fluvial flooding. The eastern and western portions of the site are located within Flood Zone 1, and as such, there is less than 0.1% chance of fluvial flooding. However, during the production of the Eccleshall flood risk assessment, it was identified that the flood maps were produced using old data and modelling techniques, therefore, the flood maps were likely to overestimate the areas shown to be at flood risk.

A modelled exercise was undertaken in consultation with the Environment Agency to confirm the true extent of the flood outline, based on the existing river channel geometry and site topography.

This exercise has shown that the extent of flooding is significantly less than that shown on the Environment Agency website. The majority of the site is shown to fall within Flood Zone 1, although there is an area to the north east of the site which remains within Flood Zone 2. This area will be left as open space.

Subject to Environment Agency approval, it is anticipated that the Environment Agency will update their flood maps with the revised outlines in April / May 2018.

The EA Surface Water Flood Map indicates that there are areas of the site at 'very low' risk (1 in 1,000 year annual chance of flooding) and 'low' risk (between 1 in 1,000 and 1 in 100 years). Surface water from the proposed development will be managed by Sustainable Drainage System (SuDS) which will mitigate any risk of surface water flooding.

From a review of the British Geological Survey 'Groundwater Flooding Susceptibility Map' and based on the anticipated geological conditions of the site, there is a potential for groundwater flooding to occur at the surface.

The site is not at risk of flooding from other sources, such as reservoir, sewer, lakes and canal flooding.

Surface water from the proposed development will be drained by Sustainable Drainage Systems (SuDS). Considering the impermeable nature of the soil which is predominantly underlain by Mercia Mudstone, surface water discharge into the ground via infiltration is not considered suitable for this site. Therefore, a positive discharge of surface water from the new SuDS scheme into the River Sow will be required.

Peak discharge rates from the new SuDS scheme will be limited to greenfield rates prior to discharge to the River Sow with surface water attenuation provided within the site for rainfall events up to 1 in 100 years with an allowance for climate change.

Foul water from the proposed development will be drained by a separate foul water drainage system that will be connected to the public foul water sewer located within or close to the southern boundary of the site. The peak foul water discharge rate and the connection point will be agreed with Severn Trent Water.

Additional investigations are being undertaken to determine the risk of flooding to potential development.

4.3. Ecology and Biodiversity

A Preliminary Ecological Assessment was carried out in 2017 with subsequent protected species surveys, recommendations and enhancements detailed in the Ecological Appraisal for the site (October 2017).

Species specific surveys were undertaken in 2017 to include great crested newt, badgers, water vole, otters, reptiles and bats. All were absent with bats the only species recorded within the application site. As such, seasonal bat transect and static detector surveys highlighted the boundary hedgerows and trees are used on an occasional basis by the local bat population.

The proposals for the site should offer the scope for habitat creation to be incorporated into the green infrastructure across the site and wider landscape, and allows for the retention of boundary features such as hedgerows and trees. These provide a valuable commuting and foraging resource for local wildlife.

Key habitat features of ecological importance including the River Sow, its tributaries, hedgerows, watercourses and central woodland copse should be retained within the proposals. These areas should be buffered and managed for wildlife, including invertebrates, nesting birds and foraging bats via habitat enhancements and mosaic of grasslands. The retention, enhancement and long-term management of these ecological receptors will minimise the potential effects of proposed development and ensure net gains to biodiversity are provided.

The provision of habitat enhancements along the northern site boundary could increase the overall biodiversity value of the site with enhancement through native species planting, attenuation facilities and species rich meadow grassland replacing current poor semi-improved grassland (low ecological value).



View north across the site, towards existing trees along the northern site boundary and the tributary of the River Sow.

4.4. Cultural Heritage

An archaeological and cultural heritage assessment is being undertaken for the site.

The site does not contain any designated heritage assets. It is located approximately 180m east of the Scheduled and Grade II* Listed Eccleshall Castle (1008801 and 1039062). It also lies adjacent to Eccleshall Conservation Area (005), and north-east of the Grade I Listed Church of the Holy Trinity (1180335) which is located within Eccleshall. The

proposals should consider the sites proximity to these assets, and ensure that their settings are respected.

Development should be set back from Castle Street, thereby preserving its rural character. Consideration should also be given to locating development to the south of the site, in the context of the existing housing, allocated site and concealing development from Eccleshall Castle as well as the majority of the Eccleshall Conservation Area.

Views from the west of the site, towards the tower of the Church of the Holy Trinity should be considered, and could contribute to the development's sense of place and provide linkages to the historic environment.



View south from PRoW Eccleshall 6 footpath across the River Sow, towards the site and Eccleshall village.

4.5. Utilities

A full utilities search has been conducted to identify any existing services across the site.

The search identified a number of constraints within the site, detailed below and shown on the plan opposite:

Gas

- » Cadent Gas – formerly known as National Grid, records show an 8 inch, steel, medium pressure (MP) gas main apparatus bisecting the middle part of the site, running in a south/north orientation. The MP gas main is connected to a gas governor located south of the site outside of the site boundary. This converts the MP gas main to a 250mm Polyethylene (PE) which then supplies the residential area immediately south of the site.

Electricity

- » Western Power Distribution (WPD) has an underground low voltage electricity cable running along A519 Castle Street to the west of the site and continues to enter a small section of the proposed pedestrian access to the site from the A519.

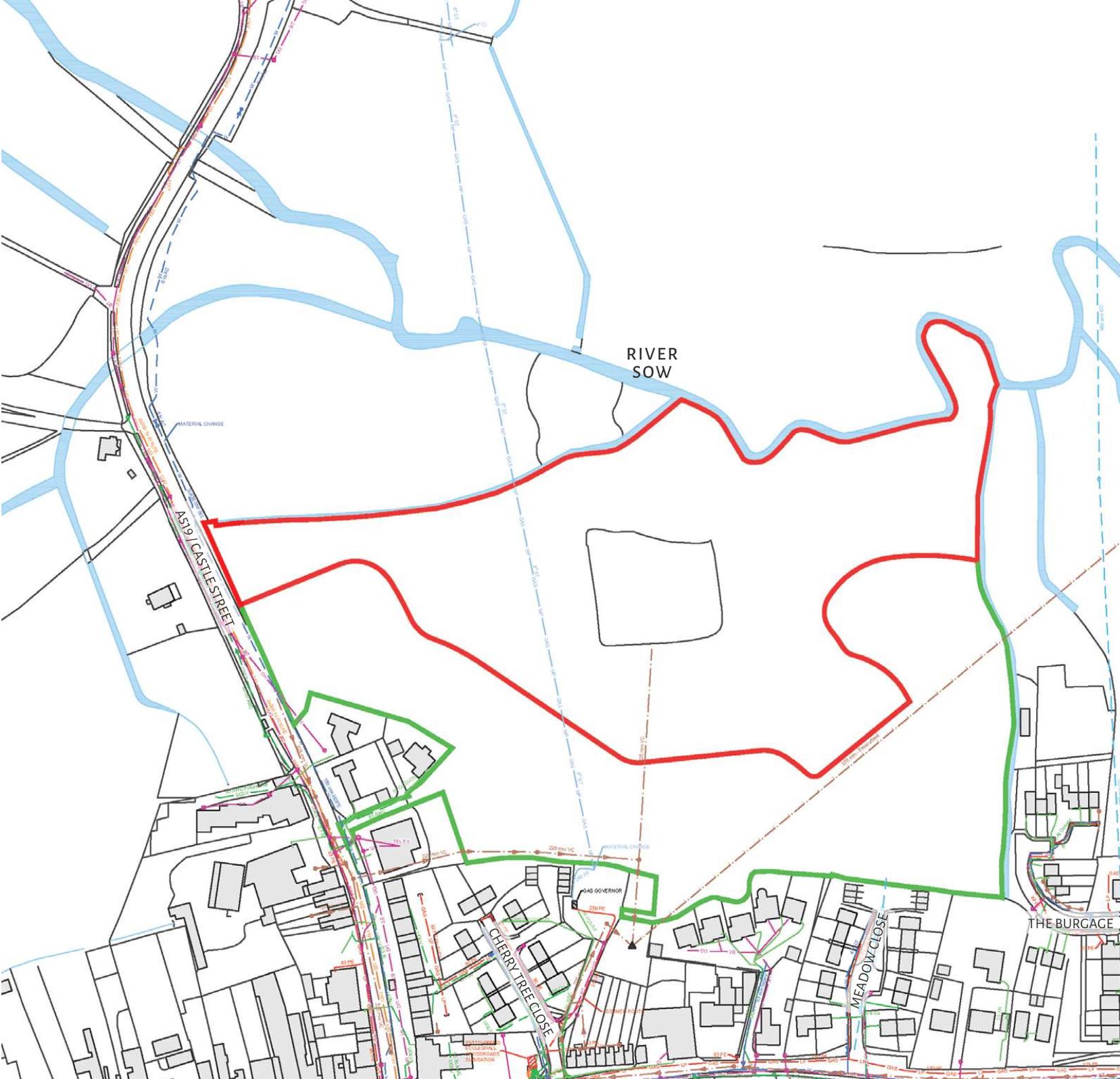
Potable Water

- » Severn Trent Water (STW) records show a 180mm potable water main crossing a small part of the proposed pedestrian access and carry on running along the A519 Castle Street, adjacent to the site boundary.
- » The records also show the water mains change in size to 6 inch and continues to run along the inner part of the top western corner of the site.

Sewerage

- » Severn Trent Water (STW) records show 225mm public foul gravity sewers running along the southern boundary within the site and then moves south to a pumping facility located outside of the site boundary.
- » STW records also show 150 mm public surface water gravity sewer, running along Meadow Close to the south of the site and enters a small section of the site boundary.
- » The records also show another 225mm public foul gravity sewer pipe running from the middle of the site, south towards the pumping facility.
- » Further assessment of STW records show a 375mm pressurised public foul sewer main, running from the pumping facility and bisecting the site in a north easterly orientation.

The capacity requirements and new service connections associated with the proposed site will be calculated, and are subject to formal approval from the appropriate service provider.



-  WPD LV underground cable
-  Electrical sub-station
-  NGG low pressure gas pipe
-  NGG medium pressure gas pipe
-  NGG gas cap end
-  Gas governor
-  STW potable water main
-  STW water valve
-  STW public surface water gravity sewer
-  STW public surface water manhole
-  STW public foul gravity sewer
-  STW public foul pressurised sewer
-  STW combined use manhole
-  STW pumping facility
-  BT overhead cable
-  BT underground cable
-  BT pole
-  BT manhole
-  BT cabinet
-  BT jointbox

Existing Utilities Plan

4.6. Arboriculture

An Arboricultural Assessment has been carried out in accordance with guidance contained within British Standard 5837:2012 ‘Trees in Relation to Design, Demolition and Construction - Recommendations’.

The guidelines set out a structured assessment methodology to assist in determining which trees would be deemed either as being suitable or unsuitable for retention along with recommendations for considering the relationship between existing trees and how those trees may integrate into designs for development.

In summary, the report concludes:

- » The site comprises a single parcel of open grassland with extensive boundary tree cover and wooded areas.
- » Species present were predominately Sycamore and Willow which range from semi mature to mature proportions.

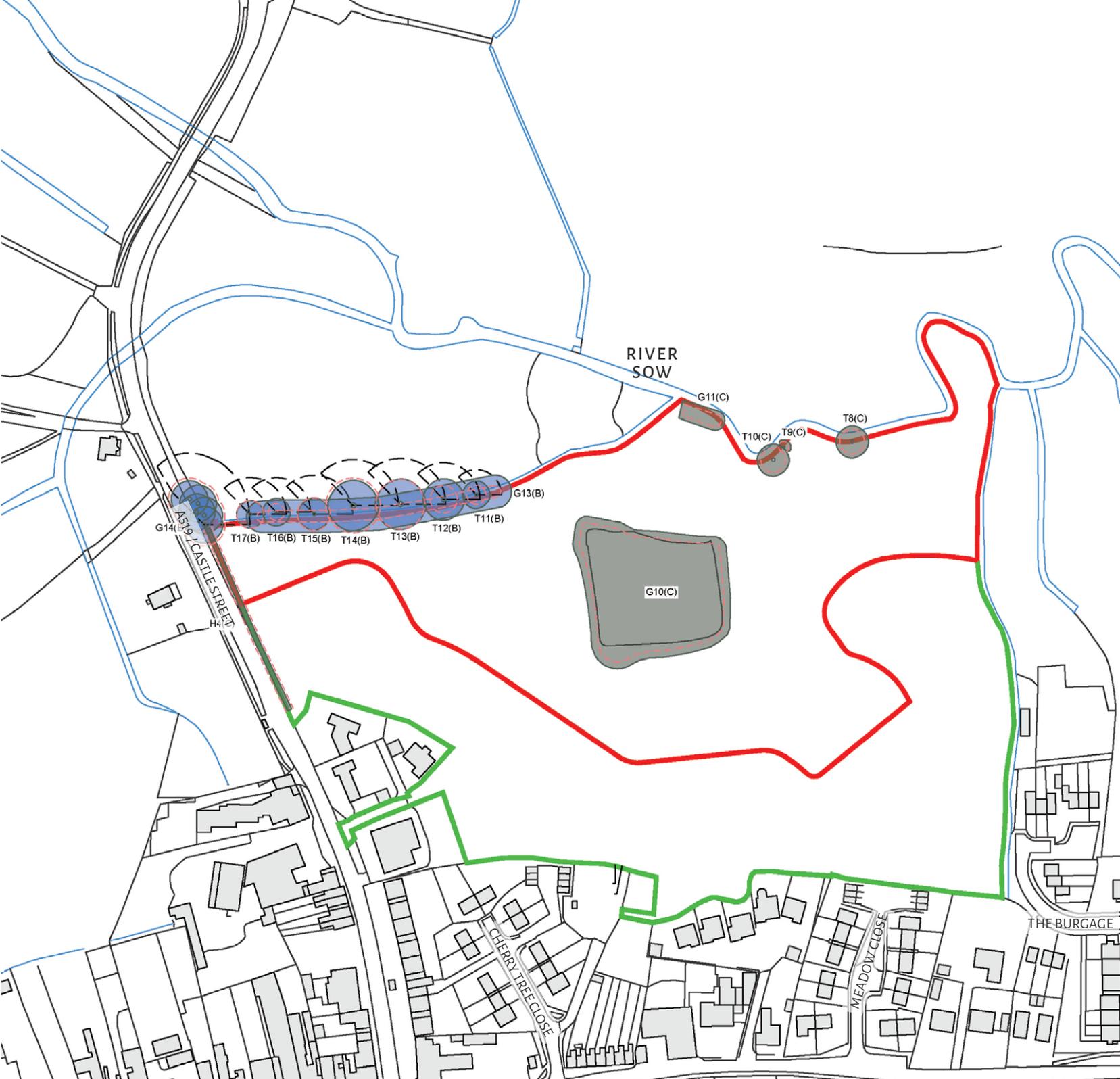
- » A mixture of other species was found with Ash, Elder and Hawthorn being dominant throughout the site.

Tree cover to the north was the most established with a linear feature consisting of sycamore trees and an established group of mixed species. A group of early mature and mature trees positioned centrally to the site also provided a key landscape feature, although the quality of the material present was considered to be low.

General condition of trees was considered to be fair, and therefore recorded as either moderate or low in arboricultural quality.

Across the site a total of ten individual trees, four tree groups and one hedgerow were surveyed as part of the Arboricultural Assessment. There were no specimens considered to be high in quality and category A. Nine areas were recorded as moderate quality and Category B, and the remaining six trees, groups of trees and hedgerow were recorded as low in quality and Category C.

The vast majority of tree cover is to be retained due to its northern position within the application boundary. Residential parcels are to be restricted to the southern extent of the application boundary adjacent to the main access road. New tree planting is to be provided across extensive areas of green open space and therefore the proposals should be considered an opportunity, in the terms of arboriculture, to improve and increase tree cover in the local area without the loss of any arboriculturally significant trees.



-  Site boundary
-  Additional land
-  Category B Tree/ Hedgerow Planting
-  Category C Tree/ Hedgerow Planting
-  Root Protection Area (altered where appropriate to reflect underground constraints)
-  Indicative Shade Pattern (in accordance with BS5837:2012 where appropriate)

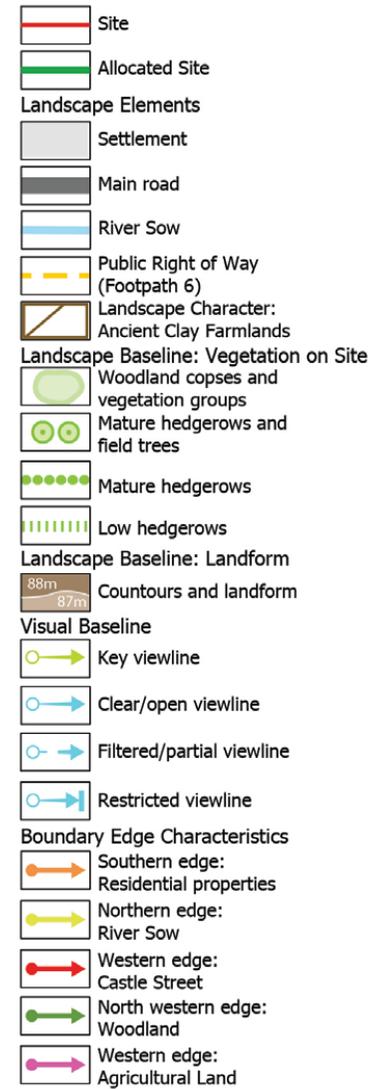
4.7. Landscape and Visual Baselines

The site sits at the edge of the countryside; this is a rural transition landscape where subtle changes occur over short distances and where the village, within its built environment and the attributes of concentrated habitation also exert influences.

Comprised of pastoral farmland with a central mature woodland copse, the landform slopes very gently towards the River Sow. In terms of the landscape attributes associated with the site, it has well defined and strong, clearly identifiable boundaries. The buildings in the village beyond the southern site boundary, sit at a similar level to the site. Further into Eccleshall and south from Stone Road, the land rises, elevating the built environment of the village onto high ground along the Stafford Road. Beyond the southern boundary both physical and visual enclosure is formed by late twentieth century houses and maisonettes, their back gardens softened by mature trees, woodland and hedgerows.

The line of Castle Street (A519) defines the western side of the site, a managed hedgerow of native species lines much of its length. A substantial area of mature trees line the adjacent side of the road adding further containment. The northern boundary has two distinct areas. On the western extent, the boundary is made by a small tributary watercourse of the River Sow. This is reinforced by tall Sycamore trees that run along and enclose the northern edge in this area. The eastern extent of this northern boundary is formed by the River Sow has fewer trees and is visually open. The river meanders severely in this area, its convoluted path is demarcated by distinctive riparian vegetation.

The landform plays an important role in the character of the site. Although the site itself near flat there is a more distinctive change in landform to the north as ground rises to form a pronounced mould. This gently rolling landform is identified to be located outside of the site and is a key characteristic of the ‘Ancient Clay Farmlands’ Landscape Character Type. The site sits comparatively low in relation to this and is visually discrete. This is enhanced by existing tree cover because of the landform, the tree cover and the placement of the settlement.



Landscape and Visual Baselines Plan



ECCLESHALL 6 FOOTPATH

RIVER SOW

ECCLESHALL 12 FOOTPATH

CASTLE STREET

CHERRY TREE CLOSE

MEADOW CLOSE

THE BURGAGE

85m

87m

86m

85m

88m

89m



View from PRow (Eccleshall 6 footpath) south-west across the site, to the rear of properties on The Burgage and Southlands Court.



4.8. Summary of Opportunities and Constraints

The findings of site and context analysis have been evaluated to identify the key opportunities and constraints to the development of the site.

A summary of these findings is set out here:

Land Use

- » Development of the site provides a natural extension to the town and will expand the existing allocation to utilise the River Sow as a firm physical boundary to growth.
- » The development proposals will consider the location of existing properties adjoining the site, and ensure that the privacy and amenity of these properties is respected.
- » The proposals will follow best practice urban design principles, and will be structured to form a legible and permeable development.
- » Opportunity to provide areas of amenity open space and formal play facilities that encourage social interaction and community use.

Access and Movement

- » Vehicular access will be taken from A519 (Castle Street) to the south west of the site.
- » There is the potential for pedestrian/ cycle access point to be located south of the main site entrance onto Castle Street, within the allocated site proposals.
- » There is the potential for a countryside green link to be provided along the northern site boundary across the River Sow, connecting the site to the PRow network (subject to future discussions).

Ecology and Biodiversity

- » The majority of the site comprises semi-improved grassland of low ecological value.
- » The habitats of ecological importance within the site will be retained and buffered to maintain wildlife corridors, and to continue to provide foraging opportunities for species such as bats.
- » It is recommended that a variety of bat and bird boxes be provided on the retained trees and new buildings within the overall scheme, to enhance roosting and nesting opportunities.

	Site boundary
	Allocated Site
	Eccleshall Settlement Boundary (Stafford Borough Council)
	Existing development
	Gravity fed foul sewer + easement (Subject to survey)
	Pressurised foul sewer + easement (Subject to survey)
	Medium pressure gas main + easement (Subject to survey)
	Water main (Subject to survey)
	Setting consideration (amenity and privacy of existing properties)
	5m contours
	Category B Tree/ Hedgerow Planting (With Associated RPZ's)
	Category C Tree/ Hedgerow Planting (With Associated RPZ's)
	Ecological buffer
	Waterbodies/ watercourse
	Offset to existing watercourse
	1 in 100 yr flood extent
	1 in 100 yr + 30% flood extent
	1 in 100 yr + 50% flood extent
	1 in 1000 yr flood extent
	Low Point (Possible Attenuation Area)
	Eccleshall Conservation Area
	Grade II Listed Building
	PRow- Footpath
	Existing permissive path
	Potential vehicular access point
	Potential pedestrian and cycle access point



Flooding and Drainage

- » The River Sow is located along the northern boundary of the site.
- » A minimum easement of 8m from the river bank will be required.
- » Flood modelling exercise has shown a reduction in the land at flood risk.
- » New flood maps show the majority of the site to fall within Flood Zone 1.
- » Development will be directed away from areas of flood risk.
- » The development will consider the use of Sustainable Drainage Systems (SuDs) to accommodate and manage surface water drainage.

Heritage and Archaeology

- » The location and setting of the Eccleshall Conservation Area will be respected within the proposals.
- » Buffer to be provided to the north of the site to Eccleshall Castle (Scheduled Ancient Monument and Grade II* Listed).

Landscape and Landform

- » Enhance Green Infrastructure of the site in line with landscape strategy for the Ancient Clay Farmlands LCT rebuilding the structure of the landscape through the re-planting of hedgerow trees;
- » Opportunities should be taken to retain and reinforce areas of mature trees ensuring the existing broadleaved character is respected;
- » The incorporation of marginal shrub planting around the areas of attenuation to increase biodiversity; and
- » To enhance, define and create a unified character along the new settlement edge.

Utilities

- » Appropriate easement for the identified utilities will be integrated into the masterplan proposals.
- » The capacity requirements and new service connections associated with the proposed site will be calculated and appropriate infrastructure provided for the future development.



30

ECCLESHALL
Please drive carefully

BEER GIN CIDER
BEER
FESTIVAL
FRI JUNE 16TH 6-12
SAT JUNE 17TH 12-12
SCOUT HQ
WELCOME

View south-east along the A519 (Castle Street) towards the proposed site access

5. Design Principles

5.1. Concept Masterplan

The concept masterplan for the site (presented opposite) shows how the proposals for Castle Street have been informed by the Vision and initial site analysis presented earlier in this document.

The plan seeks to ensure that the scheme will offer a high-quality place to live that is responsive to the sites setting, and has also been guided by the following design principles:

- » Deliver additional limited growth for the town, beyond the existing strategic allocation but that the full landholding will utilise the River Sow as a natural barrier to future growth.
- » Provision of up to 20 new dwellings.
- » Vehicular access will be taken from the A519 (Castle Street) via a new priority T-junction, serving the allocated site.
- » There is the potential for an additional access point to be located in the south-west of the allocated site, providing a dedicated pedestrian access to Eccleshall village centre.
- » Potential opportunity for a pedestrian foot bridge link north over the River Sow to the permissive Eccleshall Walk 8 route and the wider PRoW network.
- » Potential for a new car park serving Eccleshall, alleviating congestion in the centre of the village.
- » Development has been shaped by existing green capital within the site, and existing tree and hedgerow planting has been retained wherever possible.
- » Development will be structured to ensure the creation of a permeable and legible place, with streets and spaces overlooked by active frontages wherever possible, encouraging natural surveillance and safety.
- » Development will front onto the development in the south of the site, and back onto the eastern site boundary, respecting the amenity and privacy of existing and proposed dwellings.
- » Easements for the utilities crossing the site have been accommodated within the proposals allowing future access for service providers.
- » Informal pedestrian routes through the site, providing the opportunity for a circulatory walk, promoting healthy lifestyle choices.
- » Open space will be orientated and located to make the best use of existing landscape assets.
- » Provision of new formal play facilities, benefitting both the existing and proposed community.





ECCLESHALL 6 FOOTPATH

WALK 8 ROUTE

RIVER SOW

A519 / CASTLE STREET

ECCLESHALL 12 FOOTPATH

NEW RESIDENTIAL DEVELOPMENT

CHERRY TREE CLOSE

MEADOW CLOSE

THE BURGAGE

5.2. Landscape Strategy

The residential development will be set in a new landscape of wildflower meadow grassland and parkland trees, all created for public access and enjoyment. The character of the landscape will form a strong prompt in the creation of this new public parkland.

The intention is to set the residential use within a publicly accessible riverside park. This strategy is a response to the setting of the site and to the nature and character of the spaces along the northern boundary – the longest boundary with the countryside. The parkland will have a naturalistic planting pattern of new waterside trees that are typical of the meadows along the River Sow in Eccleshall.

New native hedges are proposed around the majority of the drives, lanes and streets that run at the edge of the houses and homes. This public realm boundary treatment is relevant to the place and will form an effective physical barrier as well as a visual filter that will be attractive and have a biodiversity value.

Play provision is anticipated to be an important component of the new public parkland. A formal play space is shown on the proposals and will, like much of the detail of the development be refined and enhanced as the proposals progress. The opportunity for a circular exercise trail is clear. So too is a play strategy that promotes ‘natural play’ with reference to: water meadows and the enjoyment of the more natural aspects of wildlife as well as the seasonal changes throughout the year.

The landscape strategy for the public park is not separate to the residential scheme. The landscape and proposed homes form an integrated design proposal. The landscape and visual analysis has been applied and has influenced the early concepts for the masterplan. The objective is to craft a scheme that has a responsibility to make an attractive addition to the village, as well as creating a new edge to the village.

The connectivity between the proposed residential dwellings and the parkland will be made via new public paths which will allow access to the new parkland within the site and the wider landscape to the north. Overall it is a unified and holistic proposal that ensures the whole scheme has a strong sense of place and a responsibility to its setting through a sympathetic and informed design strategy.



Illustrative Landscape Strategy Plan

WALK 8
ROUTE

VIEW LINE TO
THE BURGAGE
ON HIGH LANES

RIVER
SOW

ECCLESHALL
12 FOOTPATH

A519 / CASTLE STREET



6. Summary of Aspirations

Our proposals for Castle Street, Eccleshall have been informed by the vision and initial site analysis presented within this vision document.

Overall the key benefits of development at Castle Street are:

- » Provision of an attractive and high quality residential development that retains existing landscape assets within the site.
- » Development in a sustainable and accessible location that maximises proximity to local facilities in Eccleshall village.
- » Residential development with multi-functional green infrastructure, amenity open space and ecological habitat creation that provides areas for recreation and formal play, bringing benefits to the new and existing community.
- » Potential to significantly enhance the setting of the River Sow through the creation of a new Country Park.
- » Provision of an accessible development, with the potential to enhance pedestrian connectivity to the Public Rights of Way network beyond the site.





View west along Eccleshall High Street with Grade I Listed Church of the Holy Trinity in background.



James Chadwick
Economic Development and Planning Policy



Stafford Borough Council,
Civic Centre,
Riverside,
Stafford

18 September 2018

VIA EMAIL ONLY

Dear 

Stafford Borough New Local Plan: Scoping the Issues – Consultation

Thank you for consulting Staffordshire County Council on your new Local Plan. As with the previous development plan we are already working closely together and will continue to do so as the Plan evolves, including exploring the opportunity that may exist for a new settlement.

The consultation focuses on scoping the issues that should be considered in the preparation of the new Local Plan. We set out below our comments by theme and have sought to provide answers to the consultation questions where relevant to County functions.

Transport

We have already begun a dialogue over the transport evidence that will be required to inform and support the Plan. This will include engaging with Highways England throughout. We will continue to work with you as the Plan evolves.

The NPPF 2018 paragraph 107 recognised the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. This follows the publication earlier this year of the Governments' National survey of Lorry Parking and joint MCHLG and DfT letter to chief Planning Officers. Given this and the loss of spaces at the existing Doxey Road lorry park consideration

the knot unites



may need to be given to whether there is an adequate supply of such facilities remaining in the Borough.

Public Health

It will be essential that the Plan ensures that people can live healthy and active lifestyles. In that respect the Plan should have regard to and cover the wider determinants of health and the specific role Plan policies can have on the health of local residents. It is suggested therefore that there is a continued dialogue and consultation with our Public Health department on the application of the Plan policies and decision making in respect of the effect on public health.

The Plan will need to have regard to issues around an ageing population, including the housing options that may be required. The County Council is in the process of undertaking a countywide project to provide an insight and intelligence around the need for and supply of specialist housing for older people across Staffordshire up to 2037. The 'Next Generation Care' project is directed at helping potential suppliers and developers of specialist accommodation to make informed business decisions around future development opportunities in Staffordshire but the evidence base and assessment is equally relevant to plan making.

One of our key reports, the 'Staffordshire-wide evidence base: Extra Care and Care Homes,' provides evidence on the current and future extra care and care home needs of the people in Staffordshire, and provides the outcomes of modelling based on current and predicted needs and gaps or pressure points. This report could be useful in helping determine the proportion of specialist accommodation for older people needed for the Borough and plan for that accordingly.

In addition to the county evidence base, we are developing a series of district focused Locality Analysis reports. These will provide information on the current supply and location of all specialist accommodation for older people, including any major developments which have planning approval, in the main towns and conurbations. They also explore accessibility by foot and public transport of the main services and amenities that are important for supporting an independent living model, using reasonable walking distance calculations for an older person.

The evidence base and locality analysis, can be found at <https://www.staffordshire.gov.uk/health/Information-for-providers/Information-for-providers.aspx>

In addition to the above documents officers at the County are available to discuss options and considerations for mainstream housing suitable for older person with lower or no care needs such as adaptable housing, bungalows etc. This may include providing data to support use of enhanced buildings regulations part M.

Economy

We have been working alongside you in considering the scope of the employment evidence required for the plan, including the needs assessment (EHDNA) work. We will continue to assist and input throughout the process of determining employment needs and at a later stage provide assistance in consideration of any skills and training requirements.

Education

Question 2:

The Local Plan should help to ensure that there is sufficient education infrastructure available to meet the needs of the homes that are proposed to be large development sites would be required to provide land for school sites in addition to education contributions to mitigate the development.

Question 4:

Generally the key service villages which were earmarked within the adopted local plan included primary schools that could either accommodate the proposed housing growth or were capable of expansion to mitigate the housing growth already proposed. Depending upon the location and proposed dwelling numbers of future sites for a Local Plan which extends to 2040, further expansions may not be possible at certain locations. Should further development be proposed in these areas as part of a revised settlement hierarchy then land will be required for new school sites or to enable expansion of existing schools. This could also be a factor in establishing an appropriate scale and mix of housing.

It is noted that the Call for Sites exercise to inform the New Local Plan resulted in 160 submissions, once there is further detail on the 160 sites with the publication of a Strategic Housing & Employment Land Availability Assessment (SHELAA) report, a more detailed consideration of impact on education infrastructure can be undertaken.

Also noted is the different settlement hierarchy proposed within the Settlement Assessment for the proposed Local Plan period which comprises of seven settlement levels. It is further noted that a new garden settlement is in the concept stage. The requirement for education infrastructure in these settlement categories is considered below under question 18.

Question 6:

From an education perspective development should be considered on sites of sufficient size to be able to support the provision of infrastructure and local amenities necessary.

Question 18

What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities:

There are currently 57 schools within Stafford Borough. Within Stone, which operates a three tier education system (First, Middle and High schools) there are 10 first schools, 1 catholic primary school, 2 middle schools and 1 high school. There are 3 primary schools which due to their location on the Stafford Borough boundary are identified for school place planning purposes as being within the "Blythe Bridge school place planning area" and operate within a two tier education system. Stafford has 6 secondary schools and 34 primary schools, operating with a two tier education system.

Due to the impact of housing within the adopted Local Plan there are plans for three new primary schools two will be North of Stafford town, and one to the West

of the town. In addition there will be a new secondary school in the North of the town. In Stone, both of the middle schools have recently increased capacity and the only high school is being expanded to meet demand from the housing already proposed, commenced or built.

In Stafford, the location and number of dwellings proposed as part of a Local Plan up to 2040 would influence what additional capacity would be needed and whether this would take the form of expanding existing local schools or the provision of new schools. Any large scale development or the cumulative impact of a number of small to medium sized development sites in proximity to each other could require land for new schools to be provided, as an indication 1,000 dwellings equates to 1 form of entry (FE) of primary school places and 5,000 dwellings equates to a new 5 FE secondary school, which is considered the minimum size for a viable secondary school. The existing six Stafford secondary schools providing school places for the town and outlying areas of Stafford are located in or on the edge of Stafford town and any proposed development in villages and outlying areas of Stafford town would need to take into consideration the impact not just on the local primary schools but the wider impact on secondary schools.

In Stone, the location and number of dwellings proposed as part of a Local Plan up to 2040 would influence what additional capacity would be needed and whether this would take the form of expanding existing local schools or the provision of new schools. As an indication 1,000 dwellings equates to 1FE of provision at first, middle and high. The two middle schools have already increased capacity, whilst the high school is currently being expanded to provide additional places. Any further development could require land for new schools to be provided for all three phases of education. Both the middle and the high schools are located within Stone Neighbourhood area. These schools provide middle and high school places for all of Stone, so any proposed development in villages and outlying areas would need to take into consideration the impact not just on first school provision but the impact across all phases of education.

The North Staffordshire Urban Areas includes parts of Blythe Bridge, Trentham, Clayton and Meir Heath/Rough Close. There are three primary schools Fulford Primary, Meir Heath and Springcroft Primary which are in the administrative boundary for Stafford Borough which are covered by the Blythe Bridge school place planning area. Meir Heath and Fulford primary schools cannot be expanded further due to constraints of the school sites. There would be limited potential to increase capacity at Springcroft primary. For secondary school provision these primary schools fall within the catchment area of Blythe Bridge High, rather than Stafford Secondary schools. The Staffordshire Moorlands Local Plan Submission (February 2018) does not include any housing which would directly impact on these three schools. There are however two housing developments with planning permission which are within the wider Blythe Bridge school place planning area for which additional capacity is being provided.

Large Settlement Villages

Barlaston: There is some potential to expand the existing school dependant on the number of new homes proposed and education contributions may be sought.

- Eccleshall: The existing school is being expanded to provide capacity from the current housing and there is no potential to expand further. A new primary school including land would need to be factored into any consideration for further growth.

- Gnosall: The existing school has previously been expanded and there is no potential to expand further. A new primary school including land would need to be factored into any consideration for further growth.
- Great Haywood: There is no potential to expand either of the two existing schools, both of which are land locked. A new primary school including land would need to be factored into any consideration for further growth.
- Hixon: There is limited scope to expand the existing school dependant on the number of new homes proposed and education contributions may be sought.
- Little Haywood/Colwich: There is a proposed expansion at the existing school. There is no scope to expand further. A new primary school including land would need to be factored into any consideration for further growth.
- Yarnfield: The local primary school has already been expanded and there is no scope to expand further. A new primary school including land would need to be factored into any consideration for further growth.

Medium Settlement Villages

- Barlaston Park: There is no school within this village the catchment school for this area is in Barlaston.
- Brocton: There is no school within this village the catchment school for this area is in Stafford.
- Brocton A34: There is no school within this village the catchment school for this area is in Stafford.
- Derrington: There is no school within this village the catchment school for this area is in Seighford.
- Fulford: There is no potential to expand the school due to constraints of the site. A new primary school including land would need to be factored into any consideration for further growth.
- Great Bridgeford: There is no school within this village the catchment school for this area is in Seighford.
- Haughton: There is limited capacity to expand the existing school dependant on the number of new homes proposed and education contributions may be sought.
- Tittensor: There is potential to expand the existing school dependant on the number of new homes proposed and education contributions may be sought.
- Weston: There is no potential to expand the school, which is land locked. A new primary school including land would need to be factored into any consideration for further growth.
- Woodseaves: There is potential to expand the existing school. Land for a new primary school and education contributions would need to be provided.

Small Settlement Villages

- Adbaston: There is no school within this village the catchment school for this area is in Eccleshall.
- Bradley: There is no school within this village the catchment school for this area is in Haughton.
- Church Eaton: There is limited capacity within the existing school dependant on the number of new homes proposed education contributions may be sought.
- Cotes Heath: There is no school within this village the catchment school for this area is in Standon.
- Creswell: There is no school within this village the catchment school for this area is in Stafford.

- Croxton: There is no school within this village the catchment school for this area is in Eccleshall.
- Gayton: There is no school within this village the catchment school for this area is in Weston.
- Hilderstone: There is no school within this village the catchment school for this area is in Milwich.
- Hopton: There is no school within this village the catchment school for this area is in Weston.
- Hyde Lea: There is no school within this village the catchment school for this area is in Stafford.
- Ingestre: There is no school within this village the catchment school for this area is in Great Haywood.
- Milford: There is no school within this village the catchment school for this area is in Stafford.
- Milwich: There is limited capacity to expand the existing school dependant on the number of new homes proposed and education contributions may be sought.
- Moreton: There is no school within this village the catchment school for this area is in Church Eaton.
- Norbury: There is no school within this village the catchment school for this area is in Woodseaves.
- Norton Bridge: There is no school within this village the catchment school for this area is in Eccleshall.
- Oulton: There is potential to expand the existing school dependant on the number of new homes proposed and education contributions may be sought.
- Ranton: Additional land adjacent to the existing school would be required to enable any expansion.
- Salt: There is no school within this village the catchment school for this area is in Weston.
- Seighford: Additional land adjacent to the existing school would be required to enable any expansion.
- Stallington: There is no school within this village the catchment school for this area is in Fulford.
- Swynnerton: There is no school within this village the catchment school for this area is in Yarnfield.

In November 2017, the Borough Council announced that the new Local Plan would also consider whether there should be a new garden settlement at land near to Swynnerton. Whilst it is noted that a garden town settlement is a concept, such a development would require significant infrastructure in terms of provision for primary and secondary aged pupils, the scale of which would depend on the proposed number of dwellings; as an example only 6,000 dwellings would require 6 FE of primary aged provision and 6 FE of secondary aged provision, the land for the new schools and cost of building the infrastructure would need to be met by developer contribution. Phasing of delivery of infrastructure and its funding will also need to be carefully considered and planned.

In considering the spatial distribution of new housing growth Home to school transport should be factored in. Children in the villages without schools may be entitled to home to school transport where the catchment or nearest school is over two miles walking distance at primary or three miles at secondary. Should a proposed distribution of new homes result in additional dwellings falling into the

home to school transport criteria there would be further implications in terms of transport costs, logistics and highway constraints around school sites. This could involve education contributions being sought towards and transport costs.

Additionally Staffordshire County Council are required to consider the nature of the route to school and as a result have to provide free travel assistance when below walking distance in some cases – for example (this is not an exhaustive list), areas of Norbury to Woodseaves Primary, Cotwalton to Alleyne’s High School, sections of Yarnfield Lane to Walton Priory Middle, and Tixall Road near Tixall Court and The Haywards to The Weston Road High School. For developments in areas where we are aware of this being the case, could involve education contributions being sought towards transport costs and/or improvements to the highway network.

Education Other Comments – The “Settlement with Facilities” table

The table indicates a school in Swynnerton, the Catholic Primary school closed in August 2007 due to falling school numbers.

The table indicates one school in Great Haywood this should be two schools.

The table should indicate one school in Little Haywood.

Milford the table incorrectly indicates a school.

The table should indicate one school in Seighford.

Aston by Stone and Hyde Lea are shown with schools these are a private prep school and grammar school respectively and as such do not factor in the planning of school places by Staffordshire County Council.

Ecology

Paragraph 2.8 appears contradictory as it starts by recognising the three pillars of sustainability and then goes on in the same sentence to leave out a tangible environmental aspiration while making clear that there are targets for housing and employment development:

The adopted Plan for Stafford Borough’s spatial vision seeks to deliver sustainable development through economic, social and environmental objectives through a place-based approach, through the creation of 500 new homes and 8 hectares of employment land every year over the Plan period 2011-2031, in order to provide for the future needs and prosperity of residents.

New housing and employment could deliver a 20% net gain for biodiversity, as is the case already in Lichfield District.

Question 2:

The Local Plan should deliver a net gain for biodiversity in line with NPPF 2018 32, 72a, 102d, 118a, 170d, 174b & 175d. The last 2 references indicate that a measurable net gain for biodiversity should be achieved.

Question 3:

The principle of accessible natural greenspace is well-established and all residents should be able to reach an area of natural greenspace. Policy might aim to provide for this and could go some way towards reducing impacts on Cannock Chase Special Area of Conservation.

In relation to Paragraph 3.70 (p23) the introduction to this might be better if it read ‘national and international law’ since it goes on to refer to RAMSAR sites. Please note a Typo - Motte Meadows should be listed with the other SACs.

Question 28:

The Local Plan should provide for

- Protection and enhancement of existing sites, habitats and species
- Creation of ecological networks and stepping stone habitats (NPPF, 174)
- a strategy for the water environment (see also comments under question 30)
- Measurable net gain for biodiversity, preferably by specifying a standard for percentage gain, such as Lichfield has adopted (20% net gain). Without a stated standard, developers will tend to bring forward proposals with a very small net gain (usually less than 1%). Net gain should be measured using a published metric, such as that used in Warwickshire; there are plans to develop a Staffordshire version.)
- NPPF (2018) 175(c) makes clear that irreplaceable habitats should be given special consideration in the planning system, with ancient woodland and veteran trees cited as examples. Stafford Borough does have veteran trees outside ancient woodlands, which will need specific consideration as isolated veteran trees are often vulnerable.
- Site allocation
 - At least a basic assessment for any likely biodiversity issues, including habitats, protected and key species should be undertaken on any sites likely to be allocated for development. This is because any constraints need to be identified early and may reduce the area of developable land within a site. NPPF makes clear that the first priority is to avoid harm (avoid, mitigate compensate hierarchy.) In some cases the basic assessment might only involve confirming existing information, and in other areas such as ploughed land aerial photographs may provide sufficient information.
 - Where owners / developers are bringing forward land for inclusion the onus might be on them to provide this information in the form of a Preliminary Ecological Appraisal (PEA.) If this is the case it is important to note (and make clear to the developer) that this work will likely have to be re-done at development stage because surveys such as PEA are only valid for two years.
- Evidence base - existing evidence derived from Staffordshire Ecological Record may need to be supplemented with further survey work e.g. potentially an Extended Phase 1 Biodiversity Study of key areas. This would provide vital evidence for a strategic approach (see also question 31). I would welcome the opportunity to be involved in devising this study.

Question 30:

It is important that the Local Plan ensures protection of the water environment and new (NPPF, 165) and retrofitted SUDS, buffering waterside habitat and removal of artificial barriers such as weirs and culverts may all form part of a strategy for achieving this. These may also help with flood management (NPPF, 157c refers).

Question 31:

In relation to Ecological networks and opportunity mapping the NPPF makes several references to ecological networks including at paragraph 171:

171. Plans should:... ..take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries

The most recent county strategy for biodiversity is the Staffordshire Biodiversity Action Plan (BAP)(3rd edition, 2001) which is probably at too broad a scale and rather out of date, although could provide a starting point (<http://sbap.org.uk/actionplan/index.php>). Further work is needed to devise a detailed strategy for the Borough, ideally in cooperation with neighbouring districts, and by using ecological modelling methods. Staffordshire Ecological Record holds suitable data and expertise for this process, although further survey work may be needed.

It is probable that timescales will not allow for a network / opportunity strategy to be developed within the Local Plan timescale. It would be helpful if a Policy were incorporated that recognises that a strategy will emerge during the plan period.

Archaeology and Historic Landscape Character

It is welcome that this scoping document recognises the value of the historic environment of the borough, and in particular the powerful influence that the historic environment can have on people's quality of life, its contribution to character and distinctiveness of an area, and its role in supporting other objectives such as tourism, green infrastructure, and recreational objectives. The historic environment (not just historic listed or unlisted buildings, but also, for example, archaeology, historic character, street patterns), can also help engender a sense of pride, identity, and place, and it is important that the new local plan for Stafford, like the existing 'Plan for Stafford Borough', identifies the contribution that this resource continues to make to Stafford Borough's unique rural and urban landscapes. In order to do this the New Local Plan, in respect to the Historic Environment (including designated and undesignated below-ground archaeology and landscapes), and as required by the NPPF, should be based on adequate, up-to-date and relevant evidence. The production of the New Local Plan provides an opportunity to consider a great deal of 'new' evidence which was not available when the current plan was being produced. This 'new' evidence includes:

- Extensive Urban Surveys for Stafford, Stone, Eccleshall, and Church Eaton, see <https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Extensive-Urban-Survey/Staffordshire-Extensive-Urban-Survey-Project.aspx> for more. These synthesise our knowledge and understanding of the heritage assets which contribute to the development and character of these urban areas.
- The results of the Chase Through Time Project, see www.chasethroughtime.info. Utilising LiDAR this project identified hundreds of previously unknown heritage assets, many of which relate to the two Great War training camps which were built on Cannock Chase.

In addition to considering the above, it would also be important to re-visit the sources that were (potentially) used as the evidence base for the current plan. These are likely to have been updated or are still relevant, and include:

- Information on the Heritage List for England (i.e. designated heritage assets such as scheduled monuments, listed buildings, registered parks and gardens), see www.historicengland.org.uk/listing/the-list for more
- The Staffordshire Historic Environment Record, see <https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Historic-Environment-Record/HistoricEnvironmentRecord.aspx> for more. This includes both designated and undesignated heritage assets and comprises information on above and below ground heritage, historic landscapes, and records of previous archaeological works
- Conservation Area Appraisals
- Historic England's Heritage At Risk Register, see <https://www.historicengland.org.uk/advice/heritage-at-risk/search-register/> for more
- Stafford Borough Historic Environment Assessments, which includes Eccleshall, Gnosall, Stafford Environs, Stone, and the Haywoods, see <https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Projects/Historic-Environment-Assessments.aspx#StaffordBoroughHEA>. It is noted that these documents are now nearly a decade old and it is acknowledge that a degree of review of them is advised to ensure that they continue to be relevant to the aims of the District Council in protecting and enhancing all types of heritage asset
- Staffordshire Historic Farmsteads Assessment, see <https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Projects/Historic-Farmsteads.aspx>
- Staffordshire Historic Landscape Character Assessment, see <https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Projects/Historic-Environment-Projects.aspx#HistoricLandscapeCharacterisation> – data available from the Staffordshire Historic Environment Record

In addition to this evidence base, in relation to the Historic Environment, the producers of the New Local Plan should also be steered by recent guidance produced by Historic England on the 'Historic Environment in Local Plans' and 'The Historic Environment and Site Allocation in Local Plans', see <https://www.historicengland.org.uk/advice/planning/plan-making/> for more. This guidance advocates a strategic approach (including the development of strategic policies for the conservation of the historic environment) to the conservation and enjoyment of the historic environment and notes the inter-relationship between the objectives for the historic environment and other elements of the plan – this approach is to be supported and should be considered by the producers of the New Local Plan.

Landscape

Question 2:

The plan should seek to protect and enhance valued landscapes and recognise the intrinsic character and beauty of the countryside in accordance with NPPF 2018

170 and 171. As set out in NPPF paragraph 172 in particular, great weight should be given to conserving and enhancing landscape and scenic beauty in Cannock Chase Area of Outstanding Natural Beauty (AONB).

Question 16:

Recreational pressure on Cannock Chase AONB is increasing as a result of housing development, which puts the key sensitive habitats that are integral to the designated landscape of the AONB at risk of detrimental impacts. There could be opportunities to address increasing user pressure through developer contributions and/or CIL directed to Green Infrastructure, to support new parks, woodlands and open space that provide for recreational use away from sensitive areas and potentially outside the AONB. This objective could be supported by strengthening and cross-referencing policy relating to landscape character with policies for wildlife and cultural heritage.

Question 27:

Paragraph 3.67 refers to the Landscape Character Assessment (LCA), *Planning for Landscape Change*. Staffordshire County Council has completed a Draft Landscape Character Assessment Review for Staffordshire (unpublished). This updated LCA incorporates evidence from the Historic Landscape Characterisation for Staffordshire. There would be benefit to the Borough from using and building on this updated assessment as supporting evidence to inform potential site allocations, policy development and in its decision making.

The Draft LCA Review included a desk based study of Inherent Sensitivity. Inherent Sensitivity is *'based upon the assumption that a landscape with a clearly defined and strongly unified character will be more sensitive to change by virtue of the fact that such landscapes are less able to accommodate 'alien' features that do not conform to the existing pattern'*, and therefore could provide support, for example, for a decision to scope out potential allocation sites. Desk based visual sensitivity data is also available, however a cautionary approach should be used in interpreting the visual sensitivity data provided in the Review, as the assessment did not consider particular development types, size or the specific nature and constraints of land cover parcels. To be robust, the Authority would therefore be advised to consider commissioning area or site specific Landscape Sensitivity Studies to assess potential sensitivity of specific sites to specified development types.

Policies should be informed by the Landscape Character Assessment and seek to conserve and enhance the character of the landscape.

In the case of Cannock Chase AONB, the Countryside and Rights of Way Act (2000) requires that Planning Authorities have regard to the purpose of conservation and enhancement of the landscape and scenic beauty of AONBs. This is supported by Revised National Planning Policy Framework (NPPF) July 2018, which in Paragraph 172 requires that *"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues."* In response, the Local Plan needs to incorporate robust policy to deliver an appropriate level of conservation and enhancement of the AONB. Policy should seek to conserve and enhance the AONB and should refer to supporting delivery the objectives of the Cannock Chase AONB Management Plan. Further detail and in the form of an SPD that sets out

design expectations for proposed development that may impact on the AONB and its setting, would be welcomed.

Possible allocation of sites where development might affect Cannock Chase AONB and its setting will also need to be mindful of the requirements of the NPPF. Whether a proposal is 'major development' remains a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. The Authority could consider defining 'major development' in relation to potential impacts on the AONB and its setting, with reference to different scales and types of development. If required, possible allocation of sites where development might affect Cannock Chase AONB and its setting could be scoped out, supported by LCA evidence and the Inherent Sensitivity study data; however to be robust, where development would potentially impact on the AONB or its setting the Authority would be advised to consider commissioning area or site specific Landscape Sensitivity Studies to assess potential sensitivity of specified development types.

Rights of Way

The plan recognises that such routes are *providing valuable access to the countryside, local parks and open spaces, helping to promote healthier lifestyles* (3.48). Ultimately the Plan needs to aspire to improve accessibility on the walking, horse riding and cycling networks (including towpath links) throughout the Borough.

The Scoping Report identifies new developments should seek to improve non-vehicular public access to the wider path network. It is essential that the plan should strive to increase the levels of physical activity and the public rights of way network should be integral to any schemes that are developed to promote this.

The Plan will also need to ensure that where necessary development makes appropriate mitigation to ensure the public path network is protected. If amendments to the path network are required to allow development to take place then these Orders need to be processed through the Borough Council before construction begins. The County Council should always be consulted in such cases. In relation to such development the planning authority need to be reminded that there are likely to be many non-definitive routes across proposed development sites which should be considered by any applicants. In many cases these routes could have become rights of way by virtue of established usage over many years and should be treated as public. There will also be sites where such usage or historic evidence has already resulted in applications being made to the County Council under Section 53 of the Wildlife and Countryside Act 1981 to add or modify the Definitive Map of Public Rights of Way, which affects the land in question.

Yours sincerely



James Chadwick
Planning Policy Officer

From: Kate Dewey [REDACTED]
Sent: 18 September 2018 09:08
To: forwardplanningconsultations
Subject: New Local Plan: Scoping the Issues - Consultation Staffs Wildlife Trust

Dear Stafford Borough Council,

Please find below some comments on the consultation documents.

Stafford Borough Council
New Local Plan -Scoping the Issues Report July 2018

1.4 Key stages of preparing the Local Plan - we have some concerns that Producing the Evidence Base is to be actioned from Autumn 2018 – Spring 2019; this is very little time to gather the ecological data required for a robust evidence base, as required by the revised NPPF which states in paragraph 174 that plans should:

'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.'

The Planning Practice guidance gives a fuller list of the features that planning authorities need to map, including the distribution of protected and priority habitats and species, and areas of irreplaceable natural habitat, such as ancient woodland.

Currently, ecological data for the borough is incomplete and out of date. Staffordshire Ecological Record holds habitat data for only around half of the borough, and many Local Wildlife Sites (LWS) have not been re-surveyed for over 10 years, and many over 20 years. There are also many un-surveyed areas with potential to be designated as LWS, as well as areas of priority habitats that have yet to be mapped, and there are likely to be further ancient woodland parcels that have not yet been added to the national register. Surveys carried out by HS2 have highlighted many new areas of interest along the route, as well as 'new' ancient woodlands. SWT's limited surveys over the last 2 years have also resulted in the discovery and designation of several new sites, and extension or reduction of others.

It would also be useful to gather data on the areas of accessible natural green space (as well as more managed open spaces) available to residents in the recognised settlements. This is important for mental and physical health and well-being. Rural locations can sometimes have the least resource in this regard, although close to countryside and footpaths, there may not be many open spaces with public access.

It would be impossible to complete the data as listed in the guidance in the short time period, and outside of the main survey season. However, key areas where more development is expected or where decisions will be made about areas for development, should be focussed upon as part of the local plan process. Some gaps may be filled via aerial photography interpretation, as well as walkover surveys, and areas of potential ecological interest highlighted for further survey to feed into the decision making process as soon as possible. It is important that this data is available, in

order to protect and avoid high value habitats and features, and plan where development can best enhance nature networks and the local environment.

2.8, 2.9 The Plan for Stafford Borough 2011-2031

While the current plan has had many successes, we are concerned that environmental objectives are not being met. The Green Infrastructure Strategy 2009 put forward many good objectives for Stafford and Stone, that have not been delivered, and several areas of key green infrastructure have been lost to development. The new local plan needs to reflect on the challenges in this area, and using good data and following national guidance, ensure green infrastructure of all types receives the same attention and delivery aims as the built environment. This will make Stafford Borough a more sustainable, healthy and desirable place to live and work.

Question 1

What would you like the Borough to be like in the future?

We would like to see the Borough lead on green infrastructure and biodiversity enhancement, delivering measurable outcomes and enhancing the green resources of the area. We would like to see developments, such as Redhill Business Park, that protect and improve the habitats and species within them, provide high quality green spaces, water management and access for residents and employees, become the norm.

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

In terms of environmental outcomes:

- 50% of water catchments in the Borough to achieve Good ecological status
- 6th of all land to be managed for wildlife (as per England Biodiversity Strategy 2020)
- All land of high nature conservation value to be identified and appropriately designated
- All developments to deliver, or contribute to, measurable biodiversity net gain.
- Designated wildlife sites to be bigger, better quality, more numerous and better connected than the current baseline.
- All residents to have adequate access to natural greenspaces, as recommended by the Natural England Accessible Natural Greenspace Standards.

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighbourhood to make it a better place to live?

In terms of issues that SWT is aware of in local neighbourhoods:

Sustainable drainage features should be retro-fitted in problem areas, for example where combined sewer systems are being overloaded, or where watercourses are suffering from flooding or pollution. This would also enhance landscaping especially in very urbanised areas.

Greening 'grey' areas as part of regeneration - increasing tree numbers, green areas and natural corridors to make areas better to live and work.

More wildlife-friendly areas in managed open space- e.g. wildflower meadows in parks. The borough has a huge amount of open spaces, most of which are regularly mown and fairly 'featureless'. Different management could enhance these as well as making efficiencies.

Better access for walking and cycling along green routes in urban areas.

Better protection and enhancement of Local Wildlife Sites through the planning system.

Question 4

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

Support for sustainable rural businesses

Support the creation of neighbourhood plans

Audit the natural resources of settlements in terms of open spaces and ecological networks, so that these can be enhanced, and help maintain the character of individual villages.

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

It may be useful to specify densities, for clarity. However, the most dense land uses should still have a minimum amount of green space and green networks within them, so this standard should be set also. Densities should seek to protect and enhance key ecological sites.

3.11, 3.12 Prioritising Brownfield Land

The document fails to mention brownfield land of high environmental value, which needs to be considered. Appropriate data on these sites needs to be included in the brownfield register. The Planning Practice Guidance states in Paragraph: 024 Reference ID: 8-024-20140306:

'A core principle in the National Planning Policy Framework is to encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. This means that planning needs to take account of issues such as the biodiversity value which may be present on a brownfield site before decisions are taken.'

Defra has published information on Open Mosaic Habitats, a specific type of habitat that is of high ecological value and which occurs on brownfield land. Where insufficient information is available, survey work may be appropriate to assess ecological value before decisions on development are taken.'

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

New greenfield sites should be chosen based on their sustainability, which includes soil conservation, biodiversity impacts and potential to enhance ecological networks, as well as transport and infrastructure factors. A map of environmental constraints and opportunities, including areas for enhancement, would help identify suitable sites. This is called for in the NPPF in terms of mapping of ecological networks.

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

In terms of green infrastructure and wildlife:

Many urban areas have poor quality watercourses, scattered green spaces, and under-managed designated wildlife sites. Unimaginative development, especially in business parks and retail areas, has damaged the character of towns, and made them less interesting and unique. Natural areas and watercourses should be enhanced in terms of quality and access, as part of each settlement's identity and character, with better green routes and open spaces within town centres.

New Local Plan

Settlement Assessment July 2018

Appendix B Settlement Profiles

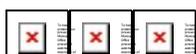
The maps of each settlement do not show all relevant environmental constraints. Local Wildlife Sites and registered ancient woodland are not shown, or other features as listed in the NPPF/ Planning Practice Guidance. The maps should also show key ecological corridors, as these are important to maintain unbroken. Biodiverse areas are important not only for wildlife but for the other services they provide such as recreational access, urban cooling, landscape and visual amenity, flood management etc. Therefore the full range of environmental constraints, and opportunities, must be mapped and considered to enable the important elements of settlements to be planned for in a positive way.

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

[Redacted]

[Redacted]



[Redacted]

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Our ref: CB/SM/ST13391-LET-0024

Date: 17 September 2018

Your ref:

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

Stafford Borough Council

New Local Plan: Scoping the Issues – Consultation

Representations on behalf of Barratt Homes and David Wilson Homes Mercia

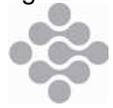
Wardell Armstrong have made representation on behalf of Barratt Homes & David Wilson Homes Mercia to the first stages of the plan review by;

- submission of the Walton Heath site as part of the Call for Sites in January 2018.
- making observations / representations on the recent strategic housing and economic land availability assessment draft methodology July 2018.

Wardell Armstrong is making representations on behalf of Barratt Homes & David Wilson Homes Mercia with specific interest to the land at Walton Heath, Stone. This focussed representation is in direct response to the above consultation process.

Question 2. What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

The evidence base will need to be brought forward alongside emerging evidence for surrounding local authorities principally Stoke-on-Trent, Newcastle-under-Lyme, Staffordshire Moorlands and Cheshire East authorities through the NPPF requirement to provide for objectively assessed needs for housing and other uses as well as any needs that cannot be met within neighbouring areas (para 11). This should be undertaken through the statements of common ground (NPPF Paragraph 27), documenting the cross-boundary matters being addressed and progress in cooperating to address these.



There is recognition that there are ‘overlapping’ market geographies, and housing market connections with these neighbouring authorities which emphasises the need for a strategic approach to any unmet housing need and wider economic growth aspirations with Stone playing its part in the performance of the wider region.

To fully meet the legal requirements of the Duty to Co-operate the Council will have to engage on a constructive, active and on-going basis with the neighbouring authorities to maximise the effectiveness of plan making. One key outcome from co-operation should be the meeting of objectively assessed housing needs (OAHN) in full (NPPF para 35).

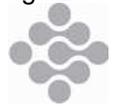
In this context it is to be welcomed that the proposed timeframe of the new Local Plan of 2020 – 2040 would now override the current Local Plan and enable strategic policies to look ahead over a minimum 15-year period from adoption (NPPF para 22).

The spatial distribution of housing and the settlement hierarchy should allow identified housing needs to be met in full by providing a framework to ensure advantage is taken of both past and future regenerative successes and challenges such as the economic impact of HS2 and specifically the new opportunities for economic and housing growth arising from the permanent new railhead (IMB-R) and associated supply chain activities in Stone. This would be in line with the aims expressed by the Department for Transport / HS2 and Constellation partnership is to develop a Growth Strategy where high speed rail will stimulate local jobs, growth and regeneration.

High Speed 2: Get Ready A report to the Government by the HS2 Growth Taskforce recommended that:

Work to include detailed consideration of HS2 in existing Local Plans and Strategic Economic Plans should be well underway by the end of 2014, including relevant aspects of the HS2 Growth Strategy. We believe that all local authorities and Local Enterprise Partnerships (LEPs) touched by HS2 – whether directly or indirectly – should challenge themselves to think about how it will act as a catalyst for development and growth across their city regions.

This area within the environs of HS2 and the new railhead, including Stone, forms part of the Constellation Partnership which has already received £1.25m in funding from the Department for Transport to develop a Growth Strategy, “to spearhead economic growth in the region.”



The development of such growth strategies to, “explain how high-speed rail will generate local jobs, growth and regeneration,” is a recommendation set out in the HS2 Growth Taskforce’s ‘High Speed 2: Get Ready’ report.

With regards to the wider area around Yarnfield, Swynnerton and Stone and the now permanent IMB-R, whilst further consideration needs to be given to the potential impact of the current design of the scheme, consideration must also be given to how to maximise the potential future plans for economic growth. As stated in the NPPF2, planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth and seek to address potential barriers to investment, such as inadequate housing, infrastructure, services, or a poor environment. The Railhead at Stone offers an obvious opportunity for such vision and policy development. The attached plan (ST13391-004) illustrates the site context, including the land the subject of Barratt Homes and David Wilson Homes interests, the location of the IMB-R and the other constraints that limit development in the area.

Matching delivery of housing alongside economic growth and employment should, therefore, be a vital element of the Local Plan Review and requires a pragmatic approach in policy development and it is imperative that Stafford Borough adopt a more positive, forward looking strategy to growth in Stone than the approach contained within the adopted Plan for Stafford in relation to:

- The need to deliver beyond the Standard NPPG methodology, which only outlines minimum targets that does not consider economic growth;
- Stafford maximising the economic benefits associated with HS2 which will require additional housing over and above minimum targets to provide appropriate market choice etc; and
- The Borough fulfilling its contribution to the Government’s ambition for 300,000 new homes a year.

The new standardised methodology will require local authorities to take its projected household growth from the latest official projections and make a fixed percentage uplift, depending on the local affordability ratio (the ratio of house prices to earnings) and predicted economic impact assessments.

Production of the household projections has now moved to ONS, which will publish its first round of projections – the 2016-based household projections – later this year.



It should be recognised that the Standard methodology outlines minimum targets that does not consider economic growth. Indeed, the Government response to the draft revised NPPF consultation highlights that:

'...it is noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September 2018. In the housing White Paper the Government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September 2018. We will consult on the specific details of any change at that time.'

Further adjustment to housing requirements in Stafford over and above the minimum targets are likely to be required in order to maximise the economic benefits associated with HS2 and to provide sufficient and appropriate choice.

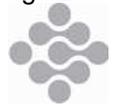
Stone is identified as a Tier 2 settlement and is a sustainable location for housing to meet future economic activity, offering high potential for growth via sustainable development, contributing to the market attractiveness.

Question 4 How could the new Local Plan support local villages and their communities to grow and thrive?

Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly (NPPF para 68) as opposed to the lead-in times for large scale sites which can affect likely rates of delivery (para 72). Stafford Borough Council need to take this into consideration when considering its position of relying on proposals to build a garden village, predominantly on Ministry of Defence land at Cold Meece, in response to the development of a railhead for HS2 in Stone. The Independent Review of Build out rates Draft Analysis - June 2018 (The Letwin Review) concluded that there is evidence that smaller sites will tend to build out a greater proportion of the site each year than larger sites.

It is clear that over reliance on such larger sites would not be appropriate in delivery of the homes needed and that a range of sustainable sites will be necessary to accommodate the OAN.

It will be prudent to set out the anticipated rate of development for specific sites and that this will need to take account of the direction within the NPPF that sites with outline planning permission, permission in principle, allocated in the development plan or identified on a



brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Setting a clear policy vision and strategy will be critical in supporting the making of Neighbourhood Plans, especially where there is an economic imperative that needs to be established.

Question 5. Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

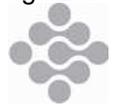
Para 122 of the NPPF now states that planning policies and decisions should support development that makes efficient use of land, but that this must take account of a range of factors, including the need for different types of housing; local market conditions and viability; available infrastructure and services and the prevailing character and setting.

Where there is an existing or anticipated shortage of land for meeting identified housing needs (para 123), it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range (123b). Therefore, a blanket approach to a minimum density across the Borough would be inappropriate and unlikely to meet the housing needs of different groups. While the Borough might set a direction as to whether it might generally prefer higher densities in order to meet its housing needs, or lower ones to be in keeping with existing housing, the inter-relationship between density, house size (any implications from the introduction of optional space and accessible / adaptable homes standards), house mix, viability and overall character and setting should be left for careful consideration at the planning stage of the development.

Question 6. National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

The revised NPPF states that the Council should make as much use as possible of previously developed land (para 117). The existing supply of previously developed land is however reducing as fast as available sites come forward for development. It should be noted that only one brownfield site in Stone is included in the most recent Brownfield Land Register for Stafford Borough. This is currently a small employment site with outline permission for 11 dwellings which has not come forward for housing since receiving outline permission back in 2007.

This reliance on brownfield sites will be a significant risk as the availability of such sites declines over time. Furthermore, the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites and it is likely to inhibit the delivery of affordable housing.



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 (para.23).

We previously welcomed the statement at 7.21 of the SHELAA methodology consultation which confirmed that sites which may be considered 'unsuitable' under the existing planning policy regime will now be assessed objectively where they are adjacent to an existing settlement as this may allow the reasonable expansion of settlements, such as Stone, in a sustainable manner.

Question 7. National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated, in term of size and location, to meet the needs of the inhabitants of the Borough without seeking a specific housing mix on individual sites.

The diverse housing needs of the people of the Borough is best met in the new Local Plan by ensuring that suitable sites are available for a wide range of developments across a wide choice of locations rather than seeking a specific mix on individual sites.

Question 8. The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

The NPPG confirms that "*different types of residential development such as those wanting to build their own homes ... are funded and delivered in different ways. This should be reflected in viability assessments*" (ID 10-009).

The assessment of housing needs in its SHMA work as set out in the NPPG (ID 2a-021) should be undertaken with evidence from reliable local information (including registrations on the Council's Self / Custom Build Register) to indicate the demand from people wishing to build their own homes.

The Council should also analyse the preferences of entries on the Self Build Register. It is often the case that only individual plots in specific, typically rural locations are sought as opposed to plots on larger housing sites and a more refined policy approach may be necessary for self-build to reflect this evidence base.



Question 12. What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

The future policy should recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites (NPPF para 85).

Para 7.21 of the SHELAA methodology consultation confirmed that sites which may be considered 'unsuitable' under the existing planning policy regime will now be assessed where they are adjacent to an existing settlement as this may allow the reasonable expansion of settlements in a sustainable manner and for wider benefits to the vitality and viability of the town centre to be enhanced through an increased catchment area / population close to shops, services, leisure and community facilities.

Serious consideration should be given to sites adjacent to Stone which are considered as 'unsuitable' under the current policy documentation as they offer opportunities for reasonable expansion of the town in a sustainable manner that in addition to supporting future economic growth will present wider benefits to the vitality and viability of Stone town centre.

Question 20. What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

As recognised within para. 103 of the NPPF, significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

Para 7.21 of the SHELAA methodology consultation confirmed that sites which may be considered 'unsuitable' under the existing planning policy regime will now be assessed where they are adjacent to an existing settlement as this may allow the reasonable expansion of settlements (including Stone) in a sustainable manner, and which enable opportunities to promote walking, cycling and public transport (NPPF para 102c).

Serious consideration should be given to sites adjacent to Stone which are considered as 'unsuitable' under the current policy documentation as they offer opportunities to promote walking, cycling and the use of public transport.

Question 23 What economic development opportunities do you consider could arise from HS2 for the Borough?

The development of HS2 in the Borough brings with it a need to actively plan and prepare to take advantage of the economic benefits arising from HS2 and that build on current strengths and on



current key priority sectors – this cannot be left to happenstance. The decision to locate the permanent Stone Infrastructure Maintenance Base-Railhead will transform connectivity advantages of the Borough, provide significant supply chain opportunities for leading engineering and construction businesses and provide a focus in driving up skill levels.

High Speed Two Phase Two Economic Case, Moving Britain Ahead (DfT July 2017) reports on the economic impacts and benefits of HS2 at a wider level, pointing to impacts which are not a direct result of the transport investment – such as travel time savings. These can include:

- Higher foreign investment into the UK, as it is a more attractive investment location due to better transport;
- Dynamic clustering, where businesses relocate to be closer together, forming clusters around well-connected places and benefiting from knowledge sharing;
- Workers moving to more productive jobs, in response to changes in transport costs, to areas that have higher productivity due to a variety of factors such as agglomeration and capital; and
- Dependent development, where property developers may react to the transport improvements from HS2 by upgrading housing stock, which could lead to regeneration.

The previous Employment Land Review undertaken for the Plan for Stafford in 2012 contains no reference to HS2 and will clearly need to provide a clear assessment of the longer term requirements arising from such impacts.

It is clear that growth will take place and will put pressure on an already stressed housing market. If supply remains restricted, the increased demand for homes will push up house prices. Matching housing and economic growth will be essential to ensure regeneration benefits are secured.

It will be important to ensure there is not an over reliance on larger strategic sites with longer lead-in times and significant up-front infrastructure improvements. BDWH seek to promote a site at Walton Heath on the edge of Stone. The allocation of such a site would be able to be delivered within a short timescale and ensure a timely provision of housing serving both the construction stage and during the operation of the railhead once HS2 services are fully operational in 2033.

As a Tier 2 settlement Stone performs highly against all the sustainability criteria set out in the Settlement Hierarchy Consultation; namely;

- High quality retail and shopping facilities within the town centre including convenience, comparison and supermarkets;
- A range of other facilities including restaurants, post office, GP surgery, dentist, library, banks and places of worship;



- A wide range of community facilities such as Primary and secondary schools, community centres and leisure facilities;
- Good access to public transport including rail services to Euston and regular bus services; and
- Allocated employment areas and future employment growth arising from HS2.

Stone is recognised as a dynamic growth point able to maximise the benefits arising from HS2.

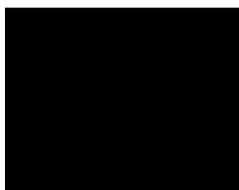
Question 29 The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

The NPPF states that *“Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans”*.

It does not state that a review should not take place. While a Green Belt review is likely to provide information as part of the evidence base for the Local plan review, it should not be forgotten that there are a number of sites outside the Green belt that can make a helpful contribution to the Borough’s housing need, not least around Stone, where significant future economic activity is planned.

Yours sincerely

for Wardell Armstrong LLP

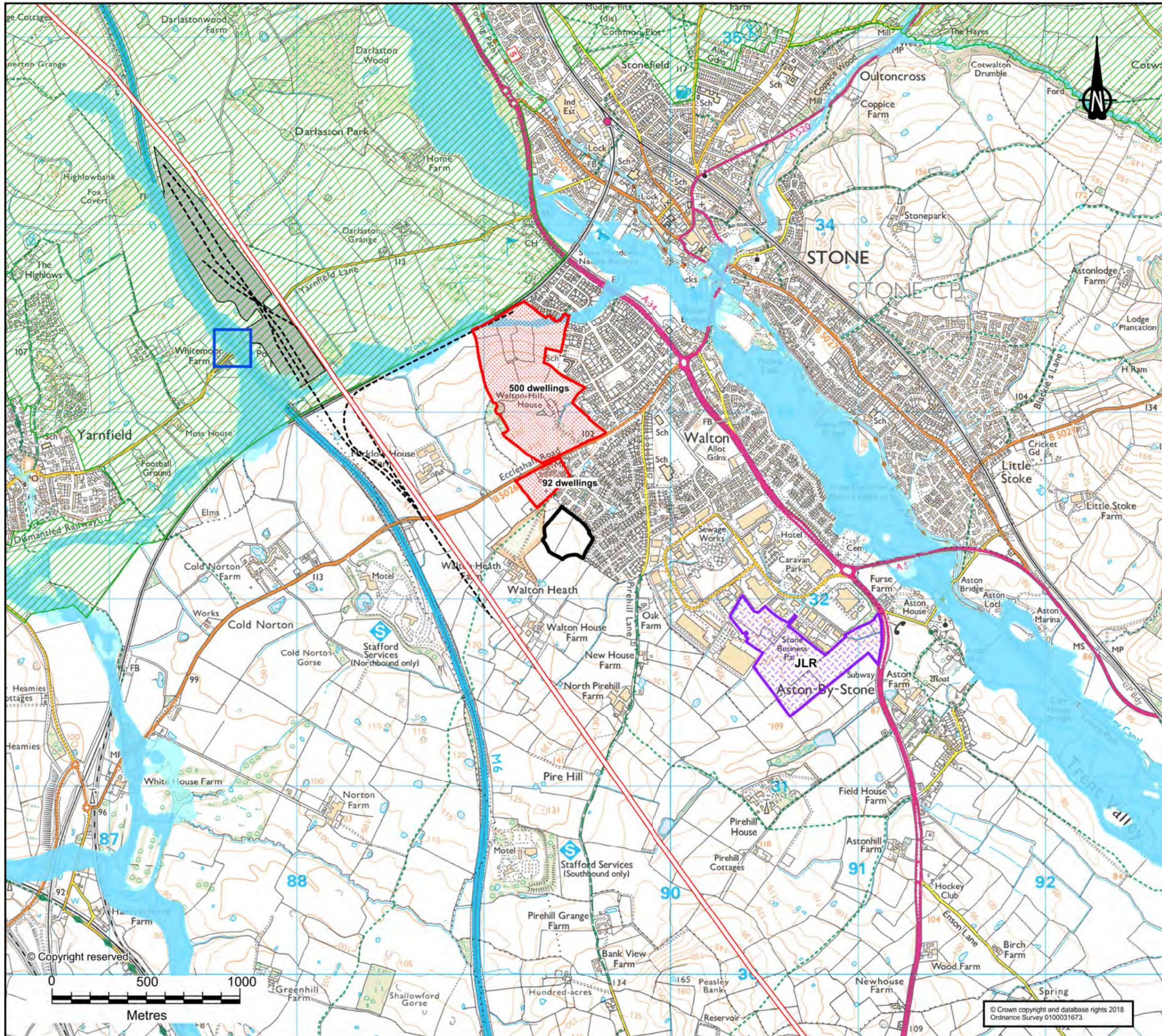


CHRIS BEAN

Technical Director



Encs



KEY

- Walton Heath Site
- Committed Sites
- Jaguar Land Rover Application Boundary
- HS2 West Mids to Manchester Route
- HS2 Maintenance Depot
- HS2 Maintenance Depot Rail Infrastructure
- Green Belt
- Junction Improvement
- Floodzone 2
- Floodzone 3

REVISION	DETAILS	DATE	DRAWN	CHK'D	APP'D
CLIENT					
Barratt David Wilson Homes (Mercia)					
PROJECT					
Walton Heath, Stone Local Plan Representations					
DRAWING TITLE					
Site Context and HS2 Location					
DRG No	SCALE	DATE			
ST13391-004	1:20 000 @ A3	Sept 2018			
DRAWN BY	CHECKED BY	APPROVED BY			
MJH	CJB	CJB			
<input type="checkbox"/> STONE-ON-TRENT (HEAD OFFICE)	TEL 0545 111 7777	<input type="checkbox"/> GARDIFF	TEL 01292 2018 2465		
<input type="checkbox"/> NEWCASTLE-UPON-TYNE	TEL 0191 252 0963	<input type="checkbox"/> LEIGH	TEL 01462 260101		
<input type="checkbox"/> WEST BROMWICH	TEL 0151 540 6600	<input type="checkbox"/> SHEFFIELD	TEL 0154 245 9243		
<input type="checkbox"/> LONDON	TEL 020 7287 2872	<input type="checkbox"/> EDINBURGH	TEL 0131 658 3311		
		<input type="checkbox"/> TAUNTON	TEL 01262 773300		

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Ordnance Survey 0100031673

From: Eastwood, Stephanie (GVA) [REDACTED]
Sent: 18 September 2018 09:53
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: New Local Plan: Scoping the Issues & Settlement Assessment and Settlement Profiles - Consultations - Taylor Wimpey Strategic Land - Land North of Shaws Lane, Eccleshall
Attachments: Scoping the issues response form TWSL - Shaws Lane.pdf; Aug 18 New Local Plan Reps TW_Shaws Lane_Eccleshall FINAL.pdf

Dear Sirs,

GVA is instructed by the Taylor Wimpey Strategic Land, to submit representations to Stafford Borough Council's (SBC's) New Local Plan: 'Scoping the Issues' & 'Settlement Assessment and Settlement Profiles' consultations. The representations also relate to land North of Shaws Lane, Eccleshall.

Please take the attached report and forms as Taylor Wimpey's formal response to the consultations.

I would be grateful if you could please confirm receipt of the attached.

We trust that the attached is clear, however, should Officers wish to discuss this in more detail or require any further information to support the allocation of the site please do not hesitate to contact me on [REDACTED] or [REDACTED]

Kind regards,

Steph Eastwood
Principal Planner

GVA

[REDACTED]

[REDACTED]



[REDACTED]



Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text"/>	Miss
First Name	<input type="text"/>	Stephanie
Last Name	<input type="text"/>	Eastwood
Job Title (if applicable)	<input type="text"/>	Principal Planner
Organisation (if applicable)	Taylor Wimpey Strategic Land	GVA
Address Line 1	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Address Line 4	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail address	<input type="text"/>	<input type="text" value="REDACTED"/>

Name or Organisation	Taylor Wimpey Strategic Land – Land North of Shaws Lane, Eccleshall
----------------------	---

Part B – Please use a separate sheet for each representation

Name or Organisation	
-----------------------------	--

Question 1

What would you like the Borough to be like in the future?

N/A

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

Please see enclosed report.

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

N/A

Question 4

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

Please see enclosed report.

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

Please see enclosed report.

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

Please see enclosed report.

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

Please see enclosed report.

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Please see enclosed report.

Question 17

National policy gives councils new powers to protect valued open spaces by designating them as Local Green Spaces. Are there any open spaces that are special to your local community which should be designated? If yes, please provide details of the open space, its location and the reason why it is special to you and your community.

N/A

Question 18

What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?

Please see enclosed report.

Question 19

19a What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?

Please see enclosed report.

19 b) Where should these be located/go?

Please see enclosed report.

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

N/A

Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

Please see enclosed report.

Question 30

Which renewable technologies do you think are most suitable for development in the Borough?
Please provide additional information as to why you deem these to be suitable.

N/A

Question 31

This document sets out the issues that need to be addressed through the new Local Plan. There may be matters that have been missed or that are not covered by the other consultation questions. Are there any matters you think also need to be considered at this stage and why?

Please see enclosed report.

Thank you for your response on the New Local Plan



Taylor Wimpey Strategic Land

**Representations to Stafford Borough Council's
'New Local Plan: Scoping the Issues' Consultation**

Land North of Shaws Lane, Eccleshall

September 2018

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6.	The Location for Housing	13
7.	Other Questions	17
8.	Merits of the Site	20
9.	Summary of Key Matters	27

Appendices

Appendix 1	Site Location Plan
Appendix 2	Aerial Photo
Appendix 3	Borough Plan Proposals Map – Eccleshall
Appendix 4	Conservation Area Boundary – Eccleshall

Prepared By: Stephanie Eastwood, Principal Planner & Robert Gardner, Director

Status: FINAL

Draft Date: September 2018

For and on behalf of GVA Grimley Limited

1. Introduction

- 1.1 GVA is instructed by Taylor Wimpey Strategic Land ("Taylor Wimpey") to make representations to Stafford Borough Council in respect of its consultation on the 'New Local Plan: Scoping the Issues' document and the 'Settlement Assessment' paper.
- 1.2 Our representations concern the land to the north of Shaws Lane in Eccleshall. Taylor Wimpey has recently agreed terms with the landowners to promote the site through the Local Plan review process. The extent of the site is identified on the location plan at **Appendix 1**.
- 1.3 Taylor Wimpey is a very experienced and successful national house builder with an extensive track record in successfully promoting sites through the planning system to achieve high quality new housing and mixed use developments.
- 1.4 Taylor Wimpey is committed to working in consultation and partnership with local communities and stakeholders to ensure that its developments reflect local circumstances.
- 1.5 The purpose of these representations is to respond to the current consultation and promote the land for residential development.
- 1.6 The remainder of this document is structured as follows:
 - Section 2 – considers the site and its context;
 - Section 3 – provides a summary of the relevant planning policy context;
 - Section 4 – considers and provides comments on the proposed scope of the New Local Plan;
 - Section 5 – comments on the need for housing in the Borough;
 - Section 6 – provides our response in relation to the location of new housing in the Borough and the Council's 'Settlement Assessment' paper;
 - Section 7 – responds to a number of the other questions posed in the 'Scoping the Issues' consultation document;
 - Section 8 – considers the planning merits of the site for residential development now; and
 - Section 9 – summarises the key matters.

2. The Site and Context

- 2.1 The site extends to approximately 11 hectares. It is located immediately to the west of Eccleshall which is a small town (also referred to as a large 'key service village'), approximately 6.5 miles south west of Stone and 8 miles north west of Stafford.
- 2.2 The site comprises five agricultural fields. There are hedges and a number of trees around the site perimeter and the internal field boundaries. The site contains wooden electricity poles and associated overhead wires. An aerial photo is provided at **Appendix 2**.
- 2.3 To the south of the site is Shaws' Lane beyond which is open agricultural land and allotments.
- 2.4 To the east of the site is the primary residential area of Eccleshall. Immediately to the east of the site is the Overton Manor site which is currently under construction by Taylor Wimpey.
- 2.5 To the north of the site are a number of residential dwellings along Church Street. Further to the north, beyond Church Street, is Holy Trinity Church and Eccleshall Cricket Club.
- 2.6 To the west of the site are a small number of residential dwellings located on Kerry Lane. Beyond Kerry Lane is open agricultural land.
- 2.7 The northern part of the site is approximately 270 metres from the village centre (**Appendix 3**) and it is within 600 metres of a Co-operative foodstore and 'The Crown' GP Surgery.
- 2.8 The southern part of the site is approximately 240 metres to the east of the Eccleshall Community Centre and Pre-School and approximately 100 metres to the south west of the Bishop Lonsdale Church of England Primary School.
- 2.9 There are bus stops within 600 metres of the site on High Street and Stafford Street. These bus stops provide regular services to Stafford Town Centre and Hanley.
- 2.10 The site is outside, but adjacent to, the settlement boundary. The northern part of the site is within the Eccleshall Conservation Area (**Appendix 4**).
- 2.11 In summary, the site is in an accessible location on the edge of a small town/ large village.

3. The Planning Policy Context

3.1 The Development Plan for Stafford Borough comprises: the “Plan for Stafford Borough – Part 1”, which was adopted in June 2014; the “Plan for Stafford Borough - Part 2”, which was adopted in January 2017; and the Eccleshall Neighbourhood Plan which was made in July 2016.

The Plan for Stafford Borough – Part 1

3.2 The Plan for Stafford Borough Part 1 provides the Council’s vision and strategy for the Borough until 2031.

3.3 Policy SP2 of the Plan states that provision will be made for 500 dwellings to be built per annum over the plan period (i.e. 10,000 dwellings in total).

3.4 Policy SP3 establishes the ‘Sustainable Settlement Hierarchy’ for development in the Borough. It states that the majority of development will be delivered through the Hierarchy as follows:

1. County Town of Stafford;
2. Market Town of Stone; and
3. **Key Service Villages of Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield.**

3.5 Policy SP4 sets out the proportions of the homes that should be built in Stafford, Stone, the ‘Key Service Villages’ and the rest of the Borough during the plan period, as follows:

- Stafford - 70%;
- Stone - 10%;
- **Key Service Villages - 12%;** and
- Rest of Borough Area - 8%.

3.6 Eccleshall is identified as a Key Service Village. The 11 Key Service Villages are required to accommodate 12% of the overall housing requirement for the Borough over the Plan period, totalling 1,200 new houses. The Plan confirms that, at the time, taking account of existing completions and commitments there was a residual requirement of 537 dwellings to be allocated at the Key Service Villages through the Part 2 Plan.

3.7 Policy SP7 states that settlement boundaries will be established for the Settlement Hierarchy. It confirms that development of a scale and nature appropriate to secure the sustainability of each settlement (i.e. in terms of housing proposals is consistent with the delivery of the proportions of development intended by Policies SP2, SP3 and SP4). It clarifies that development in other locations (i.e. other settlements or in the countryside) will only be supported in a small number of circumstances to support ‘rural sustainability’.

The Plan for Stafford Borough – Part 2

- 3.8 The Plan for Stafford Borough Part 2 guides where new development will take place across the Borough and identifies how places will be shaped in the future.
- 3.9 Policy SB1 defines the boundaries of each of the settlements, including Eccleshall, within which new housing development is generally considered acceptable.
- 3.10 The Part 2 Plan confirms that Eccleshall is “one of the larger Key Services Villages in the Plan” and that Eccleshall Parish Council has produced a Neighbourhood Plan for the Parish. It confirms that the settlement boundary identified in the Neighbourhood Plan is consistent with Spatial Principle SP7.
- 3.11 The Part 2 Plan clarifies that the settlement boundary has been drawn to include:
- land to the north of the village, which is bordered by the River Sow;
 - land to the east of the village which has planning permission for 130 houses (14/20665/OUT); and
 - land in the south west next to the school that is also allocated for housing in the Neighbourhood Plan (i.e. the Overton Manor site which is currently under construction by Taylor Wimpey).

Eccleshall Neighbourhood Plan

- 3.12 The Eccleshall Neighbourhood Plan was prepared by the Parish Council and covers the same area as Eccleshall Parish. It was formally ‘made’ and became part of the Development Plan in July 2016.
- 3.13 The Neighbourhood Plan has a plan period to 2031, consistent with the period covered by the Borough Plan. It supports housing development within the defined settlement boundary.

The Emerging Local Plan

- 3.14 In July 2017 the Council started to prepare its ‘Local Plan Review’ which will fully replace the Plan for Stafford Borough with a new development strategy, site allocations and development management policies.
- 3.15 A report to Stafford Borough Council’s Cabinet in July 2017 confirmed that the Council is undertaking a review of the Local Plan because the delivery of housing and employment sites across the Borough has meant that “more land is required to provide for future growth”. It also confirms that the Council would like to align the strategy and lifespan of the Plan for Stafford Borough with the Growth Strategy which is being prepared by the Constellation Partnership for the region (Cheshire and Staffordshire) to 2050. It also identifies that there is a legal requirement to periodically review the local plan.
- 3.16 The Council undertook an initial ‘Call for Sites’ consultation which ended in January 2018. GVA prepared and submitted representations to this consultation, on behalf of Taylor Wimpey, in respect of the land north of Shaws’ Lane, Eccleshall.
- 3.17 This report and accompanying documents provide Taylor Wimpey’s response to the ‘Scoping the Issues’ consultation on the new Local Plan and the accompanying ‘Settlement Assessment’ paper.

3.18 It is understood that the current timetable for next stages of the Review is as follows:

- Issues and Options July 2018;
- Preferred Options May 2019;
- Publication February 2020;
- Submission August 2020;
- Examination November 2020; and
- Adoption April 2021.

The National Planning Policy Framework (2018)

3.19 The NPPF was initially published on 27 March 2012 and set out the Government's guidance on town planning matters. A revised version of the NPPF was published on 24 July 2018.

3.20 Annexe 1 of the NPPF clarifies the transitional arrangements for plan-making. In particular that plans submitted for examination on or before 29 January 2019 should be examined against the policies in the previous version of the Framework and any plans submitted after 29 January 2019 will be examined against the policies in the revised NPPF. The timetable for the preparation of the 'New Local Plan' indicates that it will be examined in the context of the policies in the revised NPPF.

Presumption in Favour of Sustainable Development

3.21 The presumption in favour of sustainable development remains at the heart of the revised version of the NPPF. Paragraph 11 sets out how the presumption should be applied. In respect of plan-making, it states that:

"a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

Plan-making

3.22 Section 3 provides the updated policy in respect of plan-making. It states that Plans should:

"a) be prepared with the objective of contributing to the achievement of sustainable development;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

3.23 The NPPF states that the development plan for an area should comprise of a combination of 'strategic' and 'non-strategic' policies. It clarifies that 'strategic policies' should set out an *"overall strategy for the pattern, scale and quality of development"*, and make sufficient provision for a range of development including housing. Paragraph 22 requires strategic policies to look ahead over a minimum 15 year period from adoption.

3.24 Paragraph 23 makes it clear that 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."* (i.e. planning for and allocating sufficient sites unless these needs are demonstrated to be more appropriately met through other mechanisms such as non-strategic policies).

3.25 The revised NPPF (paragraph 24) maintains the importance of the 'duty to cooperate' on strategic matters across administrative boundaries. Paragraph 27 requires strategic policymaking authorities to prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress made in cooperating to address these. It states that these should be made publically available throughout the plan-making process to provide transparency.

3.26 Paragraph 31 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence that is adequate and proportionate taking into account relevant market signals.

3.27 Paragraph 33 requires policies in local plans to be reviewed to assess whether they need updating at least once every five years, and then to be updated as necessary. This should take into account changing circumstances affecting the area or any relevant changes to national policy.

3.28 The revised NPPF maintains the four tests of 'soundness' for the examination of policies and plans, albeit with a series of revisions. Paragraph 35 sets out that in order to be found 'sound' policies and plans should be:

"a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from

neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

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

Housing Need and Supply

3.29 Paragraph 60 introduced the “*standard method*” to be used to determine the minimum number of homes needed in strategic policies, unless exceptional circumstances justify an alternative approach. In addition to the ‘local need’ identified through the standard method it states that any needs that cannot be met within neighbouring areas should be taken into account in establishing the amount of housing to be planned for.

3.30 Paragraph 61 states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

3.31 Paragraph 65 requires authorities to establish a housing requirement for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. It goes on to state that within this overall requirement, strategic policies should set out a housing requirement for designated neighbourhood areas.

3.32 Paragraph 67 establishes that policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability including a supply of:

a) specific, deliverable sites for years one to five of the plan period; and

b) specific, developable sites or broad locations for growth, for years 6-10 and,

c) where possible, for years 11-15 of the plan.

3.33 The term “*deliverable*” is now defined in the glossary to the NPPF which states that:

*“To be considered deliverable, sites for housing should be **available** now, offer a **suitable** location for development now, and be **achievable** with a realistic prospect that housing will be delivered on the site within five years.”*

3.34 Paragraph 68 establishes a requirement for local authorities to promote a “*good mix of sites*” including 10% of housing on sites no larger than 1 Hectare unless there are strong reasons why this cannot be achieved.

3.35 Paragraph 72 establishes that the supply of large numbers of new homes can often be best achieved through planning for larger scale development “*such as new settlements or significant extensions to existing*

villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities". It states that working with the support of their communities and other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.

Rural Housing

- 3.36 Paragraph 78 of the NPPF states that in order to promote sustainable development in rural areas, housing should be located where it will *"enhance or maintain the vitality of rural communities"*. It specifically establishes that policies should *"identify opportunities for villages to grow and thrive, especially where this will support local services"*.

Green Belt

- 3.37 Paragraph 136 of the NPPF establishes that Green Belt boundaries should only be altered where *"exceptional circumstances are fully evidenced and justified"*, through the preparation or updating of plans.

- 3.38 Paragraph 137 makes it clear that before concluding that exceptional circumstances exist authorities should be able to demonstrate that *"all other reasonable options for meeting its identified need for development"* have been *"examined fully"*. It specifically states that LPAs will need to demonstrate that strategic policies:

"a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."

4. Scope of the New Local Plan

Scope

- 4.1 The NPPF requires Local Plans to be reviewed once every five years (i.e. for a review to be completed no later than five years from adoption) and be updated as necessary in order to take into consideration changing circumstances affecting the area or any relevant changes in national policy.
- 4.2 In the light of that: strategic policies in the adopted Part 1 Plan are already four years old; there has been a change in national policy; and local authorities are now required to calculate their local housing need based on the 'standard method' it is considered appropriate for the Council to undertake an immediate, comprehensive review of local policy and prepare a new local plan.
- 4.3 The New Local Plan 'Scoping the Issues' Report confirms that the Plan will replace both parts of the adopted Stafford Borough Plan (2011-2031). It is possible that the New Local Plan review could also supersede policies in adopted Neighbourhood Plans.
- 4.4 Therefore, it is understood that the New Local Plan will be comprehensive in scope and will deal with a complete range of strategic and non-strategic issues in accordance with national policy, including:
- the overall strategy for the pattern, scale and quality of development; and
 - ensuring that sufficient provision is made to meet the identified needs for: housing, employment, retail, leisure and other commercial development.
- 4.5 Given the anticipated timescales for the preparation of the New Local Plan it will need to be prepared in accordance with and examined against the policies in the new NPPF which was published in July 2018. Therefore, it will be necessary for the New Local Plan to clarify which policies cover 'strategic' issues and which deal with 'non-strategic' matters and demonstrate that these are underpinned by relevant and up-to-date evidence.

Plan Period

- 4.6 The Council proposes that the New Local Plan will cover the period 2020 to 2040. This is a plan period of 20 years which exceeds the minimum requirement of 15 years in the NPPF. This appears to be reasonable and extends nine years beyond the end of the plan period for the adopted plan.

The Duty to Cooperate

- 4.7 Paragraph 1.7 of the 'Scoping the Issues' Report deals with the 'Duty to Cooperate' and states that the Council is working collaboratively with neighbouring authorities to ensure that the Plan takes account of cross boundary issues. It also establishes that further details will be set out in 'Statements of Common Ground' as the new Local Plan progresses.
- 4.8 The new NPPF requires all strategic policymaking authorities to prepare and maintain at least one 'Statement of Common Ground' "*throughout the plan-making process*" which documents:

1) the cross-boundary matters being addressed; and

2) progress in cooperating to address these.

4.9 A Statement of Common Ground(s) is also now required in order to demonstrate that a plan is “*sound*” (i.e. “*effective*”) and ensures that strategic matters are appropriately dealt with through the plan-making process and not deferred.

4.10 No ‘Statement of Common Ground’ with adjoining authorities has been published alongside the initial ‘Scoping the Issues’ Report. We note that the consultation commenced prior to the publication of the revised NPPF. However, to accord with the requirements of national policy and ensure that strategic, cross-boundary issues are appropriately considered from an early stage in the plan-making process one or more ‘Statement of Common Ground’ with adjoining authorities should be published alongside subsequent stages of consultation on the New Local Plan.

5. The Need for Housing Now

- 5.1 Section 3 of the New Local Plan 'Scoping the Issues' Report deals with a range of 'Key Policy Areas'; one of these is the need for new homes.
- 5.2 The Report does not specifically comment on the likely scale of housing need to be accommodated in the Borough to 2040. However, the revised NPPF makes it clear that the new "*standard method*" in national planning guidance should be used in order to determine the "*minimum number of homes needed*", unless there are exceptional circumstances to justify an alternative approach.
- 5.3 Alongside the publication of the revised NPPF the Government confirmed, in July 2018, that it intends to review and consider adjusting the standard method in September 2018 in the light of updated household projections which are due to be published. Therefore, the minimum housing need for Stafford Borough ought to be calculated using any updated standard method published by the Government unless the Council is able to demonstrate that there are "*exceptional circumstances*" justifying an alternative approach.
- 5.4 In addition to the local housing need figure to be determined using the 'standard method' the NPPF makes it clear that any needs that cannot be met within neighbouring authority areas should be taken into account in establishing the amount of housing to be planned for. Therefore, any unmet needs arising from adjoining areas¹ should be set out in the Statement of Common Ground including matters being addressed and progress in cooperating to address these through the plan-making process.
- 5.5 The Report recognises that the Government has a strong agenda to increase the supply of housing to address the national shortage. Indeed the NPPF states that a key objective is to '*significantly boost the supply of new homes*'. It also requires Plans to be "*positively prepared*" in order to meet objectively assessed needs and be "*sufficiently flexible to adapt to rapid change*".
- 5.6 In order to provide flexibility Plans should identify sufficient deliverable and developable sites to ensure that the full objectively assessed housing needs are met within the plan period.
- 5.7 The Local Plans Expert Group (LPEG) has recommended that to boost significantly the supply of housing, in accordance with the Framework, and ensure that needs are met over the plan period, Local Plans should identify sufficient deliverable or developable sites to meet the housing requirement for the full plan period plus an additional allowance for flexibility appropriate to local circumstances. It recommends that to provide extra flexibility additional developable sites should be identified for approximately 20% of the housing requirement for a minimum fifteen year period from the date of adoption.
- 5.8 Therefore, the New Local Plan should also incorporate an appropriate 'buffer' (i.e. allocate sufficient sites to provide flexibility) to ensure that the minimum housing requirement would be met within the plan period and a five year supply of deliverable housing land would be maintained throughout the plan period.

¹ For example, a Statement of Common Ground produced between Newcastle-Under-Lyme Borough Council, Staffordshire Moorlands District Council, Stoke on Trent City Council and Stafford Borough Council in June 2018 states that Staffordshire Moorlands District has asked Stafford Borough to assist with meeting its identified **shortfall of 190 dwellings**. It also states that no request had been received from the City of Stoke-on-Trent Council or Newcastle-under Lyme Borough Council to accommodate any unmet housing needs within Stafford Borough, despite the emerging Joint Local Plan ('Preferred Options' consultation draft) identifying a **possible shortfall of over 1,200 homes**.

Housing Mix

- 5.9 Paragraph 3.17 of the Report states that the evidence base in relation to the mix and type of dwellings required in the Borough during the plan period will be updated during the plan-making process. This is supported and would accord with the requirements of the new NPPF which states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
- 5.10 The specific questions in the 'Scoping the Issues' Report which relate to housing mix are responded to in detail in Section 7.

6. The Location for Housing Now

6.1 The NPPF requires new housing and development to be directed to the most sustainable locations which provide a variety of services and facilities and which are accessible by public transport.

6.2 The 'Scoping the Issues' Report confirms that the adopted Stafford Borough Plan directs the majority of new housing to the "Sustainable Settlement Hierarchy" at Stafford, Stone and the Key Service Villages. It also confirms that the Council intends to review the adopted settlement hierarchy and spatial strategy for the location of housing growth in the Borough. The Report is accompanied by a separate document the "New Local Plan: Settlement Assessment" paper which sets out how the Council it intends to review the settlement hierarchy. This is considered in further detail under the headings below.

Settlement Hierarchy

6.3 The Council's 'Settlement Assessment' paper establishes the proposed methodology for the review of the settlement hierarchy to inform the spatial strategy and assist in identifying sustainable locations for new development in the Borough in the New Local Plan.

6.4 As a matter of principle, the proposed review of the settlement hierarchy appears to be a logical first step in the development of the spatial strategy for the Borough and identifying sustainable locations for new development. However, it is clear that further work will be required to assess the capacity of each settlement to accommodate growth and consider the availability of 'deliverable' and 'developable' housing sites in the Borough.

6.5 The paper outlines the following broad method for identifying a settlement hierarchy for the New Local Plan:

- 1) identification all potential settlements in the Borough;
- 2) identification of a series of sustainability criteria for categorising settlements including;
 - a. population and household numbers;
 - b. relationship with the highway network;
 - c. access to employment within 3km;
 - d. availability of key services (e.g. shops, libraries, post office etc.)
 - e. accessibility of settlements by public transport;
 - f. reliance on the car; and
 - g. availability of education facilities;
- 3) identification of 'settlement categories'; and
- 4) assessment of settlements against into the categories based on the sustainability criteria.

6.6 On the basis of the analysis undertaken the paper makes a series of recommendations about the tiers of the hierarchy and how towns and villages in the Borough could be categorised into them. However, it notes that the purpose of the report is not to set a firm description of the capacity of each settlement or the likely quantum of growth to be accommodated in each settlement.

6.7 From this process the Council has identified a seven 'tier' settlement hierarchy, as follows:

Tier	Settlement Category	Description
1	Stafford	Largest urban area with a regionally significant service centre role providing employment, retail and other facilities, and a key role in driving growth.
2	Stone	Large town providing employment, retail and other facilities for a wide area
3	North Staffordshire Urban Area	These areas are located in the north of the Borough and include Trentham Gardens, Clayton, Meir Heath/Rough Close and Blythe Bridge.
4	Large Villages	Large villages of 500 or more dwellings which act as key service centres for the surrounding rural area by virtue of the range of services and facilities they possess. Eccleshall is identified as a 'large village'.
5	Medium Villages	Medium villages of 250 or more dwellings which tend to have a lesser provision of services than larger villages that share services with nearby villages
6	Small Villages	Small villages with a definable village nucleus (i.e. not dispersed Settlement Assessment – July 2018 12 villages or ribbon development) of 50 or more dwellings with fewer services available.
7	Rest of the Borough	Development elsewhere (i.e. in an area not falling into one of the above categories)

6.8 On the face of it, the emerging 'settlement hierarchy' appears to introduce a number of new tiers or categories of settlements when compared to the adopted 'Sustainable Settlement Hierarchy', including:

- the 'North Staffordshire Urban Area' – this area was not previously identified as a separate tier of the settlement hierarchy in the adopted plan despite forming part of the north Staffordshire conurbation; and
- 'Large', 'Medium' and 'Small' Villages - the adopted Plan identifies only one tier of 'sustainable' settlements (i.e. the Key Service Villages) below Stafford and Stone but acknowledges that there are number of other settlements which were not considered appropriate for inclusion in the 'Sustainable Settlement Hierarchy'.

6.9 The Settlement Assessment Paper simply categorises settlements into the 'tiers' identified. It does identify which tiers of settlements will be considered sustainable locations to accommodate significant housing

growth. It also does not consider the capacity of each settlement or the likely quantum of growth which could be accommodated in each settlement. Therefore, it is clear that there is further work required to identify which settlements are sufficiently sustainable and suitable to accommodate housing growth and their capacity for growth. This work will be essential to inform the spatial strategy and location of housing growth in the New Local Plan.

6.10 Furthermore, the vast majority of housing growth (70%) in the adopted Plan was directed to Stafford and three Strategic Development Locations (SDLs) around the town. A further 10% was directed to Stone and a single SDL to the West and South of the town. According to the Council's latest 'Land for New Homes Housing Monitor' (2018) the 'North of Stafford' and 'West of Stafford' SDLs are unlikely to be delivered in full until the end of the current plan period (i.e. 2031) or beyond. Therefore, the new Local Plan will need to consider carefully whether:

- there is suitable land around Stafford and Stone which is available now that would not be reliant on the long-term delivery of the SUEs;
- the allocation of further land around Stafford and Stone would impact on or compromise the delivery of the existing SDLs; and
- if a greater proportion of the housing requirement needs to be accommodated at the 'Larger Villages' (e.g. Eccleshall) which have the capacity to deliver additional housing growth in the plan period without being reliant on or impacting on the delivery of the existing SDLs.

Eccleshall

6.11 Eccleshall is identified as one of a number of 'Large Villages' identified in the 'Settlement Assessment' paper. However, it is the only 'Large Village' which is also described as a 'main settlement' (along with Stafford and Stone) which have a range of retail, employment, education and community services. Accessibility to 'main settlements' is identified as an important sustainability consideration for the purpose of assessing the accessibility of the other settlements.

6.12 This suggests that: 1) Eccleshall supports a greater range of services than any of the other 'Large Villages' which are not defined as 'main settlements' and 2) is a more sustainable location for housing growth than the other 'Large Villages'. It should therefore be identified as a separate tier of settlement between 'Stone' and the other 'Large Villages'.

6.13 The NPPF supports the delivery of housing in locations which would "*enhance or maintain the vitality of rural communities*" and states that policies should "*identify opportunities for villages to grow and thrive, especially where this will support local services*". It is considered the land promoted by Taylor Wimpey for residential development on the edge of Eccleshall would provide a sustainable opportunity to deliver housing which would: allow the village to grow, sustain and enhance local services and improve the vitality of the village community.

Potential Garden Settlement

- 6.14 Alongside a review of the settlement hierarchy, the 'Settlement Assessment' paper notes that the New Local Plan will consider whether there should be a new 'garden settlement' on former Ministry of Defence (MoD) land near to Swynerton for substantial housing and employment development. However, the paper notes that this is only at "*concept stage*" and is entirely dependent on a number of factors including:
- HS2 (the Borough Council is currently petitioning for a series of changes to the High Speed Rail (West Midlands - Crewe) Bill);
 - a new motorway junction from the M6 at Stone; and
 - the MoD releasing the land for development (i.e. confirmation that the land is available).
- 6.15 Therefore, at this stage, there appears to be significant uncertainty whether a new garden settlement in this location would be "*deliverable*" in the plan period in accordance with the requirements of the NPPF.
- 6.16 Even if the a new garden settlement is in due course demonstrated to be a deliverable and sustainable option for the delivery of housing, the NPPF makes it clear that local authorities should identify a "*mix of sites*" to deliver housing. In particular it recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. In which case, a mix of site allocations would be particularly important to avoid overreliance on the delivery of a single new settlement which would be dependent on the provision of strategic infrastructure (including HS2 Phase 2a which is not expected to be complete until 2027) and have a long 'lead-in' period before it would start to deliver significant housing.
- 6.17 If the land promoted by Talyor Wimpey at Eccleshall is allocated for residential development in the New Local Plan there is a realistic prospect of housing being delivered on the site within five years and the site would almost certainly contribute to supply during the plan period.

7. Other Questions

7.1 The 'Scoping the Issues' Report asks a series of questions to assist in scoping the issues and developing the new Local Plan.

7.2 A number of these questions are of relevance to the provision of new housing in the Borough and are responded to in the paragraphs below.

Question 4. How could the new Local Plan support local villages and their communities to grow and thrive?

7.3 The NPPF supports the delivery of housing in locations which would "enhance or maintain the vitality of rural communities". This could be achieved through the direction of a greater proportion of the overall housing needed in the Borough to the most sustainable villages which have existing services and facilities, good access to public transport and have the greatest capacity for growth.

7.4 Moreover, whilst it will be necessary for a mix of site sizes to be allocated to meet the housing requirement, to ensure that new housing will help to support village communities to grow and thrive it will be necessary to ensure that allocations are of an appropriate scale and are capable of supporting improvements to facilities and infrastructure and generating an increase in population which would support the viability of existing services.

7.5 The land promoted by Taylor Wimpey for residential development would provide a sustainable opportunity to deliver housing growth which would: allow the village to grow; support local services and enhance the vitality of the village community. It is of sufficient scale that the development of the site could make appropriate contributions to improve or expand existing services and infrastructure in the village. It would also provide a range of housing (including affordable housing) which would assist in diversifying the village (e.g. through the introduction of family housing and smaller properties suitable for first time buyers).

Question 5. Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

7.6 Paragraph 123 of the NPPF states that where there is an anticipated shortage of land to meet identified housing needs, it is especially important that policies avoid development at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances, it states that plans should contain minimum density standards for city and town centres and other locations that are well served by public transport. It also states that the use of minimum density standards should also be considered for other parts of the plan area and that it may be appropriate to identify a 'range' of densities that reflect the accessibility and potential of different areas.

7.7 Therefore, as a matter of principle, Taylor Wimpey would support the use of a range of minimum densities for housing development in different areas of the Borough. However, any such policies would need to have regard to accessibility and other considerations such as local character, market conditions and other technical considerations.

Question 6. National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

- 7.8 If the Council is unable to identify sufficient 'deliverable' brownfield sites to meet its housing and employment needs through the SHLAA and Brownfield Register (accounting for any minimum density standards) it should then look to 'deliverable' greenfield land in the most sustainable locations for housing and employment in the Borough outside of the Green Belt (e.g. adjacent to sustainable settlements such as Eccleshall).
- 7.9 If there is insufficient suitable greenfield land in suitable locations beyond the Green Belt, the Council should consider the release of land from the Green Belt. This approach would accord with paragraph 136 of the NPPF which requires all reasonable options to be examined fully before considering the release of Green Belt land.

Question 7. What types of housing do you think will be most needed in the Borough over the coming years?

- 7.10 A range of housing of housing types, sizes and tenures will be required during the plan period.
- 7.11 The 'Scoping the Issues' Report confirms that the Council's evidence base in relation to the mix and type of dwellings required in the Borough will be updated. This would accord with the requirements of the new NPPF which states that within the context of the local identified housing need the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

Question 8. The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self-build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

- 7.12 Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for self-build and custom house building. Paragraph 61 of the NPPF requires local authorities to assess the 'demand' for self-build or custom-build homes. Therefore, any policy related to self-build plots should clearly be informed and led by market demand.
- 7.13 An blanket policy requiring all sites of 20 dwellings or more to provide a proportion of self-build homes is likely to be unduly onerous and restrictive, particularly if it is not based on evidence of demand. Such a policy would not be "justified" or "effective" and would have the potential to delay or prevent the delivery of other market and affordable housing in the Borough.

Question 18. What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?

- 7.14 If necessary and justified, the land being promoted by Taylor Wimpey at Eccleshall could make appropriate contributions towards additional education capacity in the village in order to accommodate pupils generated by the development.

Question 19

a) *What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?*

b) *Where should these be located/ go?*

7.15 If necessary and justified, the land being promoted by Taylor Wimpey at Eccleshall could make appropriate contributions towards improvements to health and community in the village to accommodate the needs of potential residents of the site.

Question 29. *The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?*

7.16 A review of Green Belt boundaries to accommodate new development should be undertaken if the Council is unable to identify sufficient 'deliverable' and 'developable' 'non-Green Belt' land through the SHLAA and Brownfield Register in sustainable locations to meet its identified housing and employment needs having regard to the requirements of paragraph 137 of the NPPF. It would be necessary to fully demonstrate that 'exceptional circumstances' exist for the release of land from the Green Belt.

8. Merits of the Site

8.1 As set out above, Taylor Wimpey is promoting approximately 11 hectares of greenfield land on the edge of Eccleshall for residential development in the emerging Local Plan. The paragraphs below examine the planning merits of the site and confirm that it is a sustainable and deliverable option for the delivery of housing growth in the Borough.

Deliverability

8.2 The Glossary of the NPPF (2018) establishes that, in order to be deliverable, sites should be:

- **available** now;
- offer a **suitable** location for development now; and
- be **achievable** with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

8.3 The Planning Practice Guidance (PPG)² states that sites can be considered deliverable if there are “*no significant constraints (eg infrastructure) to overcome ... can be considered capable of being delivered within a 5-year timeframe.*”

8.4 The PPG also recognises that site size is an important factor and plan makers will need to consider “*the time it will take to commence development on site and build out rates to ensure a robust 5-year housing supply.*”

Availability

8.1 The PPG³ states that a site is:

“considered available for development, when, on the best information available...there is confidence that there are no legal or ownership problems... land is controlled by a developer or landowner who has expressed an intention to develop, or ... to sell...”.

8.2 The site is currently in dual ownership. Taylor Wimpey has recently agreed terms with the landowners to promote the site through the Local Plan Review process.

8.3 This confirms not only that the landowners are willing sellers, but also that the future development of the site will be in the hands of a very experienced and successful national house builder, which will be capable of securing planning permission and delivering housing quickly assuming that the site is allocated for housing in due course.

8.4 Indeed Taylor Wimpey is currently constructing housing on the adjacent Overton Manor site. Therefore, Taylor Wimpey has a good track record of delivering housing in the village. It has also established successful relationships with the community and understands the local area well.

² PPG 5.6 Paragraph: 031 Reference ID: 3-031-20140306

³ PPG Paragraph: 020 Reference ID: 3-020-20140306

8.5 There is no legal ownership or other technical impediments. Accordingly, the site is available now in NPPF terms

Suitability

8.6 The PPG confirms that assessing the suitability of sites for development should be guided by:

- *“the development plan, emerging plan policy and national policy;*
- *market and industry requirements in that housing market or functional economic market area.”*

8.7 It confirms that when assessing sites against the adopted development plan, plan makers should *“take account of how up to date the plan policies are and consider the appropriateness of identified constraints on sites/broad location and whether such constraints may be overcome.”*

8.8 Detailed sub-criteria for assessing the suitability of sites are also set out in the PPG⁴. It confirms that a number of factors should be considered when assessing a site’s suitability for development, including:

- *“physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;*
- *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;*
- *appropriateness and likely market attractiveness for the type of development proposed;*
- *contribution to regeneration priority areas;*
- *environmental/amenity impacts experienced by would be occupiers and neighbouring areas.”*

Consistency with Policy

8.9 The site is in a sustainable location, immediately adjacent and very well-related to the existing built-up area of the small town / large village of Eccleshall. The site is located within walking distance of a range of amenities in the village centre and is accessible to public transport. There are regular bus services to Stafford Town Centre and Hanley.

8.10 Eccleshall is approximately 11 kilometres from a range of services, facilities and employment opportunities in Stafford via the A5013.

8.11 The adopted Plan identifies Eccleshall as a ‘Key Service Village’ which is one of the more sustainable locations for housing, employment and service provision in the Borough after the main towns of Stafford and Stone. It is also the only ‘Key Service Village’ with its own defined ‘Local Centre (i.e. a more substantial retail offer than any of the other Key Service Villages).

⁴ PPG Paragraph: 019 Reference ID: 3-019-20140306

- 8.12 The adopted Stafford Borough Plan acknowledges that the settlement has a significant level of services and facilities for a relatively small population. It is also located in close proximity to the Raleigh Hall Recognised Industrial Estate which is earmarked for expansion in the adopted Plan and provides employment opportunities within 2 kilometres of the site.
- 8.13 The village contains a comprehensive range of services and facilities including:
- a Primary School
 - a GP Surgery;
 - a Community Centre and Pre-School;
 - a dentists;
 - a Co-operative foodstore;
 - a library;
 - a butchers;
 - a cricket club;
 - an off-license;
 - churches;
 - a post office;
 - public houses;
 - a pharmacy;
 - takeaways, cafes and restaurants;
and
 - hair salons;
 - comparison retail shops.
 - a florists;
- 8.14 Therefore, the site is a sustainable location for housing growth. Approximately 20% of the Borough comprises land in the Green Belt. Eccleshall is not constrained by the Green Belt unlike a number of the other Key Services Villages (i.e. Barlaston, Tittensor and Yarnfield). It is, therefore, one of seven 'Key Service Villages' which are located beyond the Green Belt.
- 8.15 The site has a total area of approximately 11 hectares. If an average density of 30 dwellings per hectare is applied the entire site would have the capacity for up to approximately 330 dwellings. However, approximately 5.5 hectares of the site is located within the Eccleshall Conservation Area. Therefore, it is likely that the capacity of the site will be lower than 330 dwellings and is more likely to be in the region of around **200 to 250 dwellings** subject to the outcome of further heritage advice.
- 8.16 There were 1,320 households in Eccleshall at the time of the last census in 2011. The Neighbourhood Plan suggests that approximately 325 new homes could be accommodated on land in defined the settlement boundary. Therefore, an additional approximately 250 homes on land north of Shaws Lane would result in only a 15% increase in the number of households which would not put undue pressure on existing infrastructure. If necessary, development of this scale could also support improvements to or expansion of infrastructure in the village.
- 8.17 It is, therefore, considered that development of the site, as whole, is a suitable, sustainable option which would provide a valuable source of sustainable housing land in the District which would have the potential to make contributions towards and support improvements to facilities and services in the village.

8.18 It could also provide a range of other benefits including:

- a mix of house types (e.g. smaller starter homes and larger family homes);
- a contribution towards the need for affordable housing;
- a high quality development which respects the character and setting of the village;
- the retention of natural features (particularly mature trees and hedgerows);
- on-site public open space to potentially include elements such as children's play equipment;
- additional spending capacity and creation of a more balanced age profile in the village to support local businesses;
- increased patronage of local services and facilities to support their vitality, viability and long-term sustainability;
- jobs during the construction phase of development;
- revenue from the New Homes Bonus and Council Tax;
- other financial contributions, which might be towards improvements to local services and infrastructure and other initiatives pursued by the Parish Council.

Other Technical Matters

Flood Risk

- 8.19 According to the Environment Agency Flood Risk Map the site is located entirely within Flood Zone 1 (i.e. at low risk of flooding from rivers and the sea).
- 8.20 The Staffordshire Strategic Flood Risk Assessment (2014) also appears to indicate that the site has not been subject to any historic flooding and is at low or no risk of flooding from other sources (e.g. surface water, reservoirs or groundwater).
- 8.21 Therefore, flood risk and drainage does not represent a significant constraint to development.
- 8.22 In due course, Taylor Wimpey will instruct a specialist flood risk and drainage consultant to produce a Flood Risk Assessment and outline drainage strategy for the site.

Ecology and Trees

- 8.23 The site comprises open agricultural land. A review of the 'MAGIC' maps indicates that the site and adjoining land is not subject to any ecological designations. The nearest designated site is the Cop Mere SSSI which is approximately 1.9 kilometres from the site. Due to the intervening distance it is considered unlikely that residential development of the site would have an adverse impact on designated sites.

8.24 There are some ponds in the centre of the site and a number of trees and hedgerows. Several of the trees along the eastern boundary of the site are covered by a Tree Preservation Order and trees in the northern part of the site are protected by virtue of their location in a Conservation Area. However, the majority of these features are located along the site boundaries and development proposals should be able to avoid the removal of or significant impacts on trees.

8.25 Taylor Wimpey will, in due course, be undertaking a Phase 1 Ecological Appraisal of the site and Tree Survey which can be provided to the Council. However, on the basis of the information available at current, it is unlikely that ecology or arboriculture will be a significant constraint to residential development on the site.

Heritage and Archaeology

8.26 The northern part of the site is located within the Eccleshall Conservation Area. There are also a small number of statutorily listed buildings immediately to the north of the site.

8.27 The Council's Conservation Area Appraisal identifies the following as key elements of the 'special character' of the Conservation Area:

- a busy market town with surviving architectural and landscape features that represent Eccleshall's roots in farming, the leather trade, the market, and its Ecclesiastical importance;
- sixty one listed buildings including a church dating to the 13th century, and ancient castle site, also a scheduled monument;
- a well-preserved, ancient green space, Town Meadow (to the north of High Street);
- tall Georgian fronted buildings in dense plots on High Street, disguising buildings with much earlier origins;
- a well-preserved street pattern, lanes and burgage plots;
- an uninterrupted building line creating a visual flow along High Street, emphasised by lintels and cills and punctuated with pediments and chimneys;
- a variety of historic windows, including canted bay windows over two storeys, and 18th-19th century sashes;
- a wealth of 19th century shopfronts rich in architectural detail; and
- a number of surviving cart entrances with surviving historic paving.

8.28 The site comprises of open agricultural land which does not have any public access. The vast majority of the site is not visible from Church Street as it is set behind residential properties and a mature dense hedgerow. Due to topography there is also no inter-visibility between the statutory listed property immediately adjacent to the north west corner of the site. Therefore, it is not clear how the site makes any contribution to the overall character and appearance and, therefore, significance of the Conservation Area.

8.29 Taylor Wimpey will, in due course, be appointing a specialist heritage consultant to undertake an assessment of the significance of designated heritage assets within and adjacent to the site. This will enable a better understanding of the extent to which the Conservation Area designation and setting of nearby listed buildings might be a constraint to development in the northern part of the site and the capacity of the site, as a whole.

8.30 However, at this stage, it is considered unlikely that heritage would represent an unsurmountable constraint to residential development of the site and the southern portion of the site, in particular which lies outside the designated Conservation Area and come distance from designated heritage assets.

Highways and Access

8.31 The site is currently accessed from Shaws' Lane. Taylor Wimpey has taken highways advice from a specialist transportation consultant, Curtins, who has advised that suitable access for the site in residential use could be taken from Shaws' Lane.

8.32 The site is accessible to a range of facilities in the village centre via Shaws' Lane and Church Street to the north. It is also within walking distance of bus stops in the village which provide regular services to Stafford town centre and Hanley. It is also within 2 kilometres of the Raleigh Hall Recognised Industrial Estate.

8.33 Taylor Wimpey is taking further advice from Curtins in order to demonstrate that the residential development of the site for approximately 250 dwellings would not have an unacceptable adverse impact on the operation of the highways network.

8.34 Therefore, highways and access is not considered a constraint to development.

Loss of Agricultural Land

8.35 The Natural England Agricultural Land Classification Maps appear to identify the site as Grade 3 "good to moderate" agricultural land. It is not clear whether the site comprises Grade 3a (i.e. best and most versatile agricultural land) or Grade 3b agricultural land. However, the site would be significantly below the threshold (20Ha) for Natural England to be consulted on planning applications which involve the loss of agricultural land. Therefore, agricultural land is not a significant constraint to the development of the site.

Services and Utilities

8.36 Electricity poles and cabling pass through part of the site. It is understood that these are low voltage electricity lines which could be buried underground as part of the development.

8.37 It is also understood that connections to existing services and utilities could be extended to serve the site.

8.38 Taylor Wimpey will, in due course, be appointing a specialist utilities consultant to undertake an assessment of the significance of designated heritage assets within and adjacent to the site. This will enable a better understanding of the extent to which the Conservation Area designation might be a constraint to development in the northern part of the site and the capacity of the site, as a whole.

Other Matters

- 8.39 Taylor Wimpey will shortly be obtaining a range of other detailed technical work including in work relating to ground conditions and landscape and visual impacts.
- 8.40 It is considered that there are no technical constraints that would prevent the development of the site for approximately 200 to 250 dwellings.

Achievability

- 8.41 The site is available now. Assuming that the site is allocated for residential development through the Local Plan Review a planning application could be submitted for the residential development of the site very quickly.
- 8.42 Taylor Wimpey would be able to start to deliver housing on site shortly after the grant of planning permission and immediately following site preparation works and the discharge of any relevant planning conditions.
- 8.43 Therefore, there is a realistic prospect of housing being delivered on the site within five years.
- 8.44 As set out above, there are no significant site constraints that might prevent development or make the development unviable. Therefore, the development of the entire site is viable.
- 8.45 For the reasons set out above, the entire site is available, suitable, and achievable and is, therefore, **deliverable**.

9. Summary of Key Matters

9.1 A summary of the key matters set out in this report is as follows:-

- A comprehensive review of the Local Plan is considered necessary in accordance with the national requirement for strategic policies to be reviewed and updated as necessary at least once every five years.
- The plan period proposed by the Council (i.e. 2020 – 2040) appears to be appropriate for the New Local Plan.
- The New Local Plan will need to be prepared in accordance with the requirements of the revised NPPF which was published in July 2018. The following will need to be undertaken in accordance with the requirements of national policy:
 - the assessment of housing needs, including the mix and type of housing required;
 - the consideration of strategic cross-boundary matters - to ensure that these are addressed and not deferred; and
 - the identification of a sufficient supply and mix of 'deliverable' housing sites of a range of sizes to ensure that the full housing need is delivered in the plan period.
- In addition, in accordance with the requirements of the revised NPPF it will be necessary to demonstrate that all other reasonable options for meeting the identified development needs have been fully examined before undertaking a review of Green Belt boundaries in the Borough.
- The principle of a review of the adopted settlement hierarchy and spatial strategy for the delivery of growth in the Borough is supported. However, further work is required to: identify which settlements are sufficiently sustainable and suitable to accommodate housing growth; and assess their capacity for growth.
- Eccleshall is sustainable location with the capacity to accommodate additional housing growth in the New Local Plan. It is the most sustainable settlement after the main towns of Stafford and Stone and should have its own separate tier in the settlement hierarchy above the other 'large villages'.
- We conclude that the direction of additional housing development to sites of an appropriate scale in Eccleshall would enhance the vitality of the village community and assist it to continue to thrive by supporting the viability of local services and facilities.
- The land to the north of Shaw's Lane which is being promoted for residential development by Taylor Wimpey is available, suitable and achievable and is, therefore, deliverable in accordance with the Framework. No adverse impacts would be generated by allocating the site for housing and the level of development contemplated would not put undue pressure on existing infrastructure.

-
- The development of the entire site would offer substantial benefits and its allocation in the New Local Plan would represent a positive response to the NPPF requirement to 'significantly boost' housing delivery.

GVA

September 2018

Appendix 2

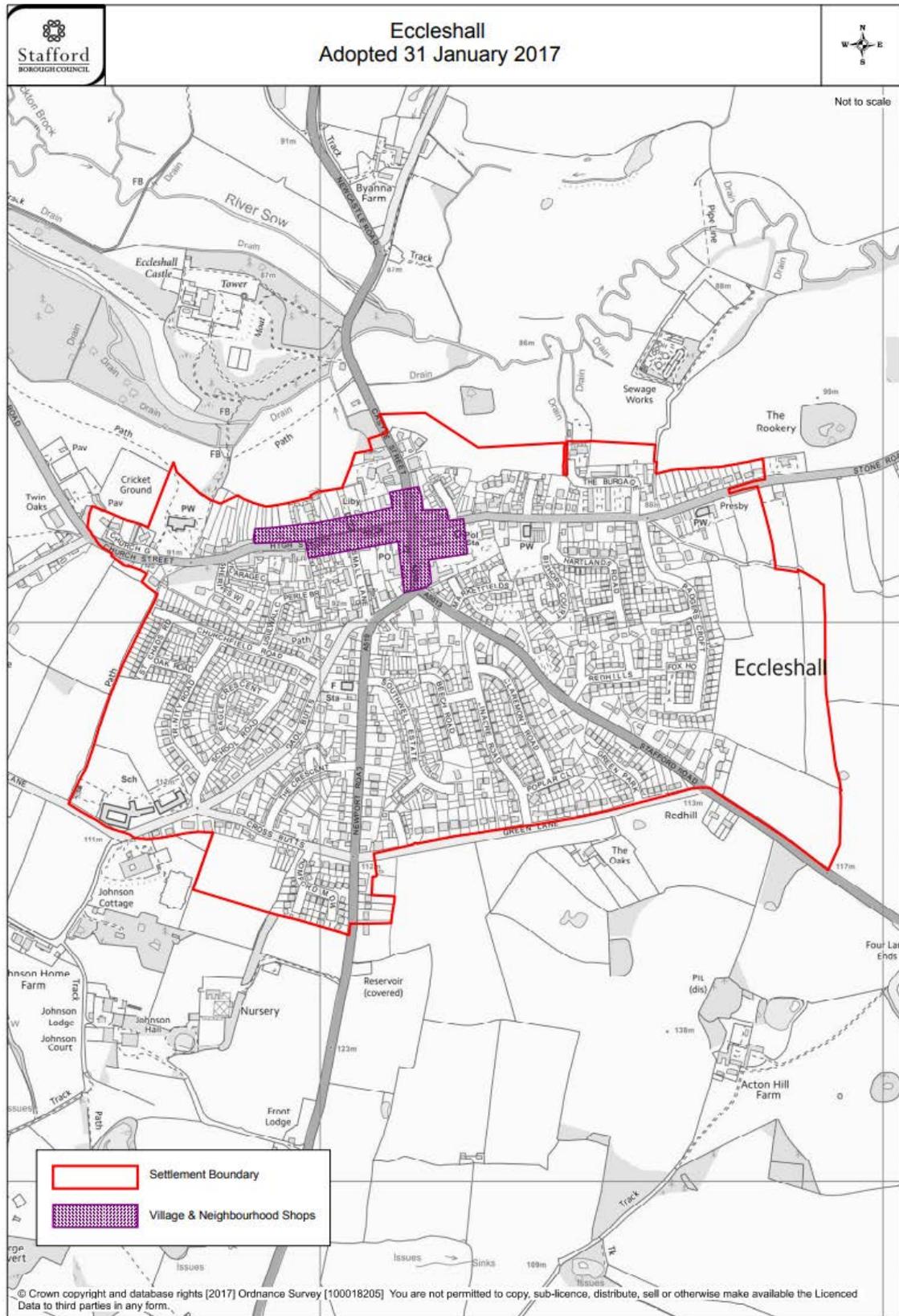
Aerial Photo



(Google Maps, 2018)

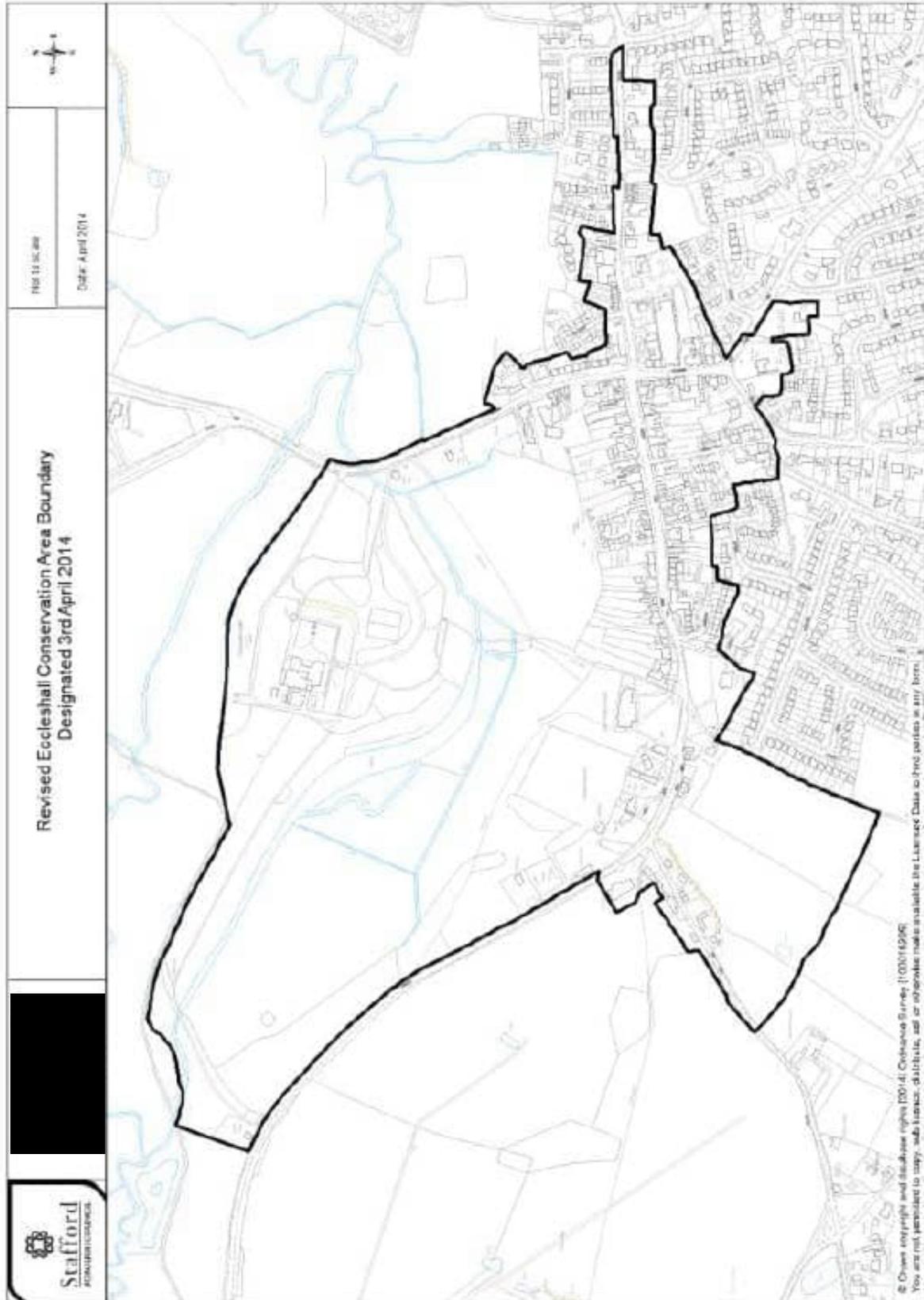
Appendix 3

Proposals Map



Appendix 4

Conservation Area Boundary



Contact Details

Enquiries

Robert Gardner, Director



Stephanie Eastwood, Principal Planner



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From: Stoney, Stephen [REDACTED]
Sent: 18 September 2018 09:54
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: New Local Plan Consultation: Scoping the Issues & Settlement Assessment/Profiles
Attachments: SBC Settlement Assessments paper 18092018.pdf; SBC Scoping the Issues (002) 18092018.pdf

Please find attached consultation responses on behalf of Dean Lewis Estates in respect of the New Local Plan for Stafford – Scoping the Issues & Settlement Assessment / Profiles..

I would be pleased in due course if you would acknowledge receipt.

[Stephen Stoney](#) | Technical Director



STAFFORD BOROUGH COUNCIL – SCOPING THE ISSUES

Response to Consultation

Introduction

This submission is in respect of the consultation regarding ‘**Scoping the Issues**’ and options for addressing them’ in relation to the Stafford Borough Local Plan Review. It is submitted by Wardell Armstrong on behalf of Dean Lewis Estates who have land interests in Coldmeece which it is promoting for development.

This should be read in conjunction with the complimentary submission on ‘Settlement Assessment and Profiles’ submitted separately.

Both submissions should be treated as further representations from Dean Lewis Estates to the Local Plan Review process in addition to previous representations.

2	<p>Thinking Forward – Developing a Vision & Key Objectives</p>
2.2	<p>“Different towns, villages and rural areas within Stafford Borough have various pressures, issues and characteristics which are worthy of protection and conservation. In addition, different areas have the potential for new opportunities which could be realised by new development or regeneration”.</p>
2.7	<p>The new Local Plan needs to deliver this vision and explore key questions such as; “what will the Borough as a place look like in the future?”, “where will people be living and working?” and “what will they be doing in their spare time?”.</p>
2.9	<p>“...it is important to move forward in order for the Borough to become an even greater place of opportunity, enterprise and excellence”.</p> <p>Question 1 <i>What would you like the Borough to be like in the future?</i></p> <p>Question 2 <i>What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?</i></p> <p><u>DLE Response to Q 1 & 2</u></p> <p>The purpose of the new Local Plan should be to set out a new vision for the development of the Borough, highlighting the key issues to be addressed, setting the objectives to guide new growth and policies to make sure that new development meets local needs in line with national policy set out the National Planning Policy Framework (NPPF).</p> <p>Dean Lewis Estates consider that the by 2040 Stafford Borough will have (amongst other things):</p>

	<p>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 including a major brownfield regeneration opportunity at Cold Meece;</p> <p>By 2040 the Borough's Villages will have:</p> <p>Delivered a range of new housing at selected villages to provide for the objectively assessed needs of the borough and, where possible, ensured that brownfield regeneration opportunities are maximised;</p> <p>Avoided development in areas that are the subject of national environmental designations.</p> <p><i>Increased the availability of accessible and enhanced high-quality services and facilities, including public transport provision;</i></p> <p><i>Provided new green infrastructure / biodiversity enhancement schemes;</i></p> <p><i>Supported a diverse and regenerated rural economy by ensuring the delivery of new homes close to key employment corridors, in particular at Cold Meece;</i></p>
<p>3.1</p> <p>3.2</p>	<p>The Local Area</p> <p>The Borough's excellent strategic transport links represent, together with High Speed Rail 2 (HS2), major drivers for positive change and regeneration in the Borough. However, more needs to be done at the local level to ensure that the benefits of economic growth are fully shared by all sections of the community.</p> <p>Whilst there is much to celebrate in terms of major new developments and jobs that have been created, there are also areas of the Borough which have not seen much investment in recent decades and are now in need of renewal and regeneration. These include older housing and industrial areas across the Borough, as well as some district and local shopping centres, where the quality of the environment and condition of buildings has begun to deteriorate. Equally, declining levels of investment or changing economic circumstances have meant that some areas no longer have easy access to an adequate range of services necessary to meet their needs.</p> <p>Question 3 <i>Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighbourhood to make it a better place to live?</i></p> <p><u>DLE Response</u></p> <p>Cold Meece sits within an identified strategic employment corridor running from Eccleshall to Swynnerton and incorporating Yarnfield and Cold Meece.</p> <p>The amount of employment floorspace and number of jobs provided here is significantly in excess of the resident working populations of these settlements and the surrounding outlying rural communities.</p>

	<p>The Local Plan should allocate sufficient land to redress this imbalance between the insufficiency of homes versus the high level of employment provision. The principle of such a policy approach will provide genuine demonstrable benefits in terms of building sustainable communities.</p> <p>Access to local community facilities and services in and around these existing communities is presently good, but additional homes at Cold Meece, making use of a major brownfield regeneration development opportunity will enhance the sustainability of these communities.</p> <p>New development at Cold Meece will deliver essential market and affordable housing together with a commensurate amount of community facilities that will serve to reinforce the vitality and viability of the existing services and facilities within this part of the Borough and help to create a thriving expanded community at the settlement of Cold Meece.</p>
<p>3.6</p> <p>3.7</p> <p>3.8</p>	<p>Deciding Where Homes Should Go</p> <p>“National policy currently states that the Plan should seek to encourage sustainable patterns of movement which means that it should make sure new housing is properly serviced by existing or new infrastructure.</p> <p>The draft NPPF introduces a new chapter on Rural Housing. It states that plans should identify opportunities for villages to grow and thrive, especially where this will support local services”.</p> <p><i>The adopted Plan for Stafford Borough 2011-2031 says...</i></p> <p>“The majority of development will be delivered through the Sustainable Settlement Hierarchy at Stafford, Stone and the Key Service Villages. Other smaller settlements in the Borough are currently not considered appropriate for growth as they have fewer services and facilities”.</p> <p>Question 4 <i>How could the new Local Plan support local villages and their communities to grow and thrive?</i></p> <p><u>DLE Response</u></p> <p>The new Local Plan should identify development that focuses on sustainable place making, exploiting regeneration opportunities involving the utilisation of brownfield land (NPPF Para 117). Such development opportunities that sit outside of the existing Local Plan settlement hierarchy should be fully appraised in terms of their suitability benefits and impacts rather than simply tested in locational terms against an out-dated settlement hierarchy approach.</p> <p>The Sustainability Assessment against which the new Local Plan will be tested should enshrine the necessary tests to assess the sustainability credentials of new development that is outside the historic settlement hierarchy.</p>

	<p>In practice, this means that the major brownfield regeneration opportunity at Cold Meece should be properly assessed in terms of its contribution toward housing delivery, sustaining and growing employment, enhancing public transport, supporting and delivering community services and facilities and delivering significant environmental benefits.</p>
3.9	<p>Making effective use of land</p> <p>National policy currently does not provide any specific advice on density of new development. However, the draft NPPF states that where there is an existing or anticipated shortage of land for meeting identified housing needs, that low density development should be avoided. The use of minimum densities standards should be set for town centre locations and that the use of minimum density standards should be considered for other parts of the plan area.</p>
3.10	<p><i>The adopted Plan for Stafford Borough 2011-2031 says...</i></p> <p>The adopted Plan for Stafford Borough 2011-2031 includes a policy that development proposals should take into consideration the local character, context and density. However, it does not set out density standards.</p> <p><i>Question 5</i> <i>Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?</i></p> <p><u>DLE Response</u> The Local Plan should provide flexibility in its policy with regard to densities. The development at Cold Meece will be guided by a Development Framework Plan that will demonstrate how the proposals respond the site context in terms of constraints and opportunities. The density of development will provides an appropriate response to these factors and will seek to maximise the reuse of brownfield land within the development.</p> <p>The Local Policy should require the provision of a Development Framework Plan to be agreed with the LPA rather than prescribe densities for each housing allocation.</p>
3.11	<p>Prioritising Brownfield Land</p> <p>Current National policy encourages the effective use of land by reusing land that has been previously developed (brownfield land), an approach that is also promoted through the adopted Plan for Stafford Borough. However, it is not always possible to build on this land and/or there is not enough of this land available.</p>
3.13	<p><i>The adopted Plan for Stafford Borough 2011-2031 says...</i></p> <p>The Local Plan prioritises the development of brownfield sites and seeks to promote the majority of new development at Stafford, Stone, the Key Service Villages. It should be noted that significant areas of employment land have now been built or have planning consent, with the number of dwellings completed or committed in the plan already having been exceeded. Going forward it is important to ensure that there is sufficient land for additional growth.</p>

	<p>Question 6 <i>National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?</i></p> <p>DLE Response The allocation of the Cold Meece site as major brownfield regeneration opportunity for housing and associated community facilities will be of major benefit to the Council in demonstrating accordance with the government’s national policy to prioritise the development of redundant brownfield sites that have good access to existing services for new housing.</p> <p>In the instance where the Council has insufficient redundant brownfield sites that have good access to existing services for new housing and employment it should look to the most suitable alternative suitable locations that avoid the high level national and locally identified environmental and spatial designations, such as Green Belt, AONB, SSSI.</p>
<p>3.15</p> <p>3.16</p>	<p>Deciding What Types of Homes to Build</p> <p>Currently national policy encourages Local Plans to plan positively for a mix of housing based on an assessment of the type of people that live in the Borough both now and in the future. This includes providing a mix of homes to meet the needs of different groups such as families with children, older people, those with disabilities or particular support needs and those wishing to build their own homes.</p> <p>Over the next few decades, the age profile of residents in Stafford is expected to change dramatically. There will be a considerable ‘demographic shift’ with both the number and proportion of older people increasing. Population projections conducted in 2010 predicted that the number of people aged 65 and over are expected to increase by 45.5% (or by 15,800) by 2035, whilst the number of residents aged 75 and above is expected to increase by 101.7% (or by 11,700) by 2035.</p> <p>Question 7 <i>National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?</i></p> <p>Question 8 <i>The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?</i></p> <p>DLE Response to Q7 & Q8</p> <p>The demographic change within SBC population within the 15 years indicates higher levels of persons above the age of 65 forming a greater proportion of the resident population in this period. For this reason, elderly persons accommodation should be</p>

	<p>supported in the new Local Plan Policy where there is good access to local services and facilities.</p> <p>With regard to custom and self-build a flexible policy approach should be introduced to encourage areas of sites to be annexed for self-build projects. An overall policy approach within the plan of circa 2% of dwellings to be provided to be from self-build projects. It would then be appropriate to assess each scheme thereafter having regard to the ability of each site to deliver such provision or to demonstrate reasoning regarding appropriateness.</p>
<p>3.22</p> <p>3.23</p> <p>3.24</p> <p>3.25</p> <p>3.26</p>	<p>Job Creation</p> <p>The NPPF states that the planning system must support sustainable economic growth, through the creation of jobs and prosperity to meet the development needs of business. Policies in new Local Plans should be flexible enough to accommodate needs, respond rapidly to changes in economic circumstances, whilst simultaneously facilitating flexible working practices.</p> <p>In recent years, there has been a contraction of the Borough’s traditional manufacturing industries resulting in significant job losses for this sector. In contrast to many other districts, Stafford has a particularly high proportion of public sector workers. Within this context, it is necessary to encourage a more balanced economic base in the future.</p> <p><i>The adopted Plan for Stafford Borough 2011-2031 says...</i></p> <p>One of the key aspirations addressed in the Local Plan is to facilitate growth in new high technology areas, such as that in creative industries, as well as developing a low carbon economy by nurturing the existing skills base and supporting local businesses.</p> <p>As the Borough is predominantly rural, one of the key aspects is to give support to achieving rural sustainability, and a prosperous rural economy. As part of the new Local Plan, the Council will need to develop a clear understanding of business needs within the economic markets operating across the Borough and wider area. This will include an assessment of the need for additional land or floorspace for economic development, including both the qualitative and quantitative needs for anticipated types of economic activity over the Plan period, including retail and leisure development.</p> <p>Alongside the need to ensure the availability of appropriate land and property to meet the forecasted growth in people seeking employment, the Local Plan will also need to support efforts to diversify the Borough’s unbalanced employment base, which is dominated by the public sector.</p> <p>Question 10 <i>What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?</i></p> <p>Question 11 <i>Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?</i></p>

	<p><u>DLE Responses Q10 & Q11</u></p> <p>The Local Plan Strategy should focus on providing new homes close to existing and proposed strategic employment locations. The employment linked to Cold Meece sits within an identified strategic employment corridor running from Eccleshall to Swynnerton.</p> <p>The Local Plan should allocate sufficient land at Cold Meece to redress the imbalance between the insufficiency of homes versus the high level of employment provision in this corridor. New housing development here will place homes close to existing and proposed employment and will serve to reinforce and enhance the existing public transport links to provide for sustainable community within this part of the borough.</p> <p>This policy approach will help to break down the barriers of access to employment and promote prosperity for the all of the community.</p> <p>Additional Employment land could be identified within this locality. Should the existing Swynnerton MoD Army Training Camp become available for development within the Plan period a comprehensive master plan for the redevelopment of the site should be devised to include provision for new homes employment and community uses as part of any mixed-use regeneration scheme.</p>
<p>3.27</p> <p>3.30</p> <p>3.32</p>	<p>Shopping and Leisure Opportunities</p> <p>Town and village centres are at the heart of community life and play a key role in shaping people’s perceptions of an area. Attractive, vibrant and prosperous town centres can act as an important catalyst for attracting growth and investment into the wider area. Equally, declining centres can have the opposite effect, and serve to deter and undermine efforts to turn round the economic fortunes of an area.</p> <p>The Local Plan seeks to strengthen Stafford town centre role for the Borough as the heart of retail, leisure and cultural provision in the area. The Local Plan also seeks to support Stone’s town centre role as a market town, and recognizes that there are a number of both Village and Neighbourhood Centres across the Borough which provide services and facilities, including daily retail convenience outlets.</p> <p>As part of the New Local Plan, the Council will need to review the existing policy approach and identify the need for additional guidance on the scale and location of new retail and leisure developments across the Borough. Consideration will also need to be given to the need to prepare more detailed town centre development and regeneration strategies to coordinate, prioritize and implement a range of measures to maintain the viability and vitality of the Borough’s wider network of town, village and neighbourhood centres.</p>

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

DLE Response

The vitality and viability of rural village centres rely on the key services and facilities within them. A new local centre at Cold Meece will play an integral role in sustaining community life and in shaping people's perceptions of the area now and for future generations.

The mixed-use regeneration proposals for Cold Meece at SLAA site: Ref ID 63 will create an attractive, vibrant and prosperous rural village centre that will play an important supporting role helping to sustain the growth and investment in the wider employment corridor.

The policy for growth at Cold Meece should recognise this potential and should encourage a comprehensively master planned approach to the Cold Meece site SLAA Ref: ID 63.

As part of the New Local Plan, the policy approach should ensure provision of a new small-scale village centre providing local convenience retailing and community facilities at a scale commensurate with the size of the expanded settlement.

The New Local Plan should also advocate a policy approach which ensures appropriate provision of a new informal recreation and leisure opportunities in addition to the existing excellent provision of formal sports facilities present within this part of the borough.

The scheme at Cold Meece will provide an integrated green landscape infrastructure that will incorporate a network of recreational tracks and trails within the scheme that will promote walking, cycling and jogging as a leisure pursuit for the well-being of the community.

Question 14

What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?

Question 15

Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres, and if so, where?

DLE Response Q14 & 15

A small-scale village centre at Cold Meece would provide one of the best locations within the Borough to serve the existing and new resident community. The existing Cold Meece settlement and its hinterland provides plethora of employment, recreation and social facilities but lacks the necessary number of homes to support a small convenience retail. Establishing a new resident community at Cold Meece on SHLAA

	<p>site ID 63 will enable Cold Meece to function as a cohesive, self-sustaining community, thereby meeting the overarching Local Plan aims and objectives of delivering sustainable development.</p>
3.33	<p>Healthy and Active Communities</p> <p>The NPPF states that the planning system has an important role in facilitating social interaction and creating healthy, inclusive communities. Policies in new Local Plans should deliver social, recreational and cultural facilities and services to meet the needs of the local community through access to high quality open spaces and opportunities for sport and recreation.</p>
3.34	<p>Planning can play an important role in creating healthy, inclusive and active communities. For example, positive planning can lead to reductions in health inequalities, by improving access to healthy food, through offering choices in the local market and reducing obesity by encouraging physical activity through the inclusion of open-spaces and leisure facilities. Planning can also facilitate social interaction which, in turn, can lead to improvements in mental health and general well-being.</p>
3.36	<p>Open Space and Sports Facilities</p> <p>Current National policy recognizes the important role open spaces play in local communities, and indicates that in developing a Local Plan, Local Planning Authorities must assess the need for open space and opportunities for new provision in their areas.</p> <p><i>The adopted Plan for Stafford Borough 2011-2031 says...</i></p>
3.38	<p>The Local Plan seeks to retain, protect, supplement and enhance all types of sport, recreation and open space facilities, in order to address deficiencies of both indoor and outdoor facilities. As a general principle, there will be presumptions that open space, sport and recreation facilities will be provided on the development site.</p> <p>Question 16 <i>What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?</i></p> <p><u>DLE Response Q16</u></p> <p>Within close proximity to Cold Meece and directly adjacent to Baden Hall, lies the home of Eccleshall RUFC and its clubhouse. The Eccleshall Football Academy site is adjacent to the entrance to Baden Hall. Within the grounds of Baden Hall there is a range of nationally recognised recreational Fishing Lakes. These facilities offer significant community facilities directly adjacent to the built settlement of Cold Meece. The development of Cold Meece will supplement further this existing impressive formal recreation offer with more informal provision that will take advantage of the major landscape structure within the 85-acre site providing routes for cycle tracks, jogging trails and footpaths.</p> <p>The development delivery policy for Cold Meece should include criteria to ensure the integration of the residential area with the provision of informal open space of the type described here.</p>

3.42	<p>Education Facilities</p> <p>New residential developments and population increase will inevitably bring an increased demand for school places. Although some local schools may have capacity, there could be a need for more places to be made available or for completely new education facilities to be built.</p> <p>Question 18 <i>What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?</i></p> <p><u>DLE Response</u></p> <p>Initial consultation with Staffordshire County Council School Organisation Team has been undertaken. The development at Cold Meece will mitigate its impact upon school places in accordance with SCC Planning Obligations Policy.</p> <p>The option exists to upgrade the existing Primary School at Yarnfield, Springfields First School which is within walking distance of the site. The school has ample land within which to expand.</p> <p>Secondary school pupils would be schooled in Stone which is short direct bus ride away.</p>
3.44	<p>Health and Community Facilities</p> <p>Good community facilities provide opportunities for interaction between people, the chance to get involved in activities and to have increased accessibility to basic services. Going forward, the Council needs to continue planning positively to meet the needs for social, recreational, cultural facilities and services. Successful health and community facilities / services are integral to the vibrancy of communities across the Borough.</p> <p>Question 19 <i>What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?</i></p> <p><u>DLE Response</u></p> <p>Cold Meece lacks a community building that would provide a hub for social interaction, organised events and hosting clubs and group activities. The development at Cold Meece will deliver such a community resource building on site, serving the wider settlement.</p> <p>If deemed necessary and desirable by the NHS Clinical Commissioning Group the building can be built in such a way so as to accommodate a General Practitioner Consulting facility, thereby enhancing the GP provision in this part of the rural community in Stafford Borough.</p> <p><i>19 b) Where should these be located/go?</i></p>

	<p><u>DLE Response</u></p> <p>The facility will be located on site at Cold Meece and will form a central hub feature at the heart of the new community.</p>
3.47	<p>Accessibility</p> <p>Sustainable Transport Choices</p> <p>Sustainable transport choices can play a significant role in improving health and wellbeing. Walking and cycling have obvious health benefits, and people who use public transport are more likely to walk for part of their journey than those who drive.</p>
3.50	<p>The draft NPPF also states that transport issues should be considered from the earliest stages of plan-making and that local planning authorities should identify development opportunities from existing or proposed infrastructure projects. In the case of Stafford Borough, this would include the new High Speed 2 Rail Link (HS2).</p>
3.51	<p>The Local Plan seeks to reduce the need to travel by private car in urban areas by ensuring that, wherever possible, new development is located close to access points (bus stops, railway stations, and park and ride facilities) along public transport corridors.</p>
3.52	<p>It also requires Travel Plans for new developments to maximise travel and accessibility by non-car transport modes via safe, attractive and conveniently designed street, pedestrian and cycling connections within the development and to nearby existing employment and communities.</p> <p>Question 21 <i>There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?</i></p> <p>Question 22 <i>Are there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.</i></p> <p>Question 23 <i>What economic development opportunities do you consider could arise from HS2 for the Borough?</i></p> <p><u>DLE Responses Q21 Q22 Q23</u></p> <p>At the strategic level the opportunity exists to exploit the already good public transport links connecting Cold Meece with Stafford, Stone and the forthcoming HS2 Infrastructure Maintenance Depot that will create a new major employment opportunity within 3km of the major brownfield Cold Meece Development Opportunity.</p> <p>Capturing the benefits of HS2 is a major government objective. Enhanced public transport provision delivered by HS2 should, as well as delivering greater and efficient public transport provision around Stafford and Stone with the new HS2 hub station at</p>

	<p>Stafford, deliver enhanced public transport connectivity to the rural areas to optimise HS2 usage. Doing so will also enhance the economic prosperity of the region.</p> <p>More locally, Coldmece is set within a major corridor of economic and social activity between Eccleshall and Stone. This area will have an even stronger identity with the delivery of the Stone HS2 IMD facility.</p> <p>The recently completed Norton Bridge rail improvements have improved accessibility in the area by road, which will be enhanced further by HS2 infrastructure upgrades.</p> <p>Coldmece is served by the No14 Bus service which links Stoke-on-Trent, Stone, Eccleshall and Stafford. This operates predominantly to serve the significant employment levels by the routeing through Coldmece from approximately 7am to 7pm in either direction hourly, with a reduced weekend service. Development at Cold Meece will reinforce the long-term commercial viability of this excellent public transport service.</p>
<p>3.53</p> <p>3.54</p>	<p>Getting Around By Road</p> <p>Stafford Borough’s location ensures that it benefits from excellent north-south transportation links: Two M6 motorway junctions are located adjacent to Stafford town providing good accessibility to the North West, the rest of the West Midlands region and beyond via the M6 and M6 Toll. However, connections in the east-west direction are less dominant.</p> <p>With the scale of development that is proposed in the Local Plan, a number of road improvements are proposed within the Borough including new sections of road and public transport provision.</p> <p>Question 24 <i>Are there any specific transportation projects that the Council should be promoting in the Local Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.</i></p> <p><u>DLE Response</u></p> <p>HS2 also offers the opportunity to create a new junction onto and off the M6 Motorway. Presently the HS2 proposals are equivocal as to whether the new junction should serve HS2 only or serve the wider network. The opportunity to enhance the connectivity of Stone and the surrounding rural hinterland to the strategic motorway way network should be fully pursued in the form a new unrestricted motorway junction.</p> <p>The distance between Stafford North and Stoke South is some 12 miles. To introduce a new junction almost equidistant between the two will secure major transport benefits for the area, shortening journeys to the motorway and lessening the throughput of traffic on the local road network.</p>
	<p>Environmental Quality</p> <p>High quality Design</p>

3.57	<p>National policy reinforces good design as a key aspect of sustainable development, and states that Local Planning Authorities should:</p> <ul style="list-style-type: none"> • Create a high quality built environment • Secure high quality design and a good standard of amenity • Promote mixed use development • Take account of the roles and characters of different areas • Plan positively for high quality and inclusive design, including individual buildings, public and private spaces and the wider area • Should have local design review arrangements in place to provide assessment and support to ensure high standards of design. <p>3.59</p> <p>Going forward the Local Plan will need to find a way to make sure that existing assets such as buildings, streets and spaces, green infrastructure and community facilities are managed imaginatively and that new developments are designed intelligently.</p> <p>Question 25 <i>National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?</i></p> <p><u>DLE Response</u></p> <p>It is considered that the Local Plan policies should enshrine the principles of high quality design to ensure that the environment within which communities live work and seek recreation function to their optimum potential and are regarded as attributes to the area.</p>
3.69	<p>Landscape</p> <p>Development should demonstrate that proposals with landscape and visual implications, should protect, conserve and, where appropriate, enhance it.</p> <p>Question 27 <i>What approach should the Local Plan take to ensure that Borough's landscape, AONB and its key features are protected and enhanced?</i></p> <p><u>DLE Response</u></p> <p>Development that is within or affects designations such as Green Belt, SSSI or AONB or other constraining designations should be avoided where possible, or strictly controlled.</p> <p>Opportunities to exploit major brownfield development opportunities at locations that are or can be made sustainable as a direct consequence of the development should be strongly supported in policy terms.</p> <p>The major brownfield development opportunity at Cold Meece is not constrained by any landscape designations nor any environmental designations. It is visually well</p>

	<p>contained and provides an excellent opportunity to deliver development that enhances the Borough's sustainability objectives.</p>
3.77	<p>The Green Belt</p> <p>As there is sufficient land to serve the development needs of Stafford Borough beyond the planned period, safeguarded land for development in the Green Belt has not been identified. The Plan identifies 3 major locations that are listed as Major Developed Sites in the Green Belt defined with a boundary; namely at Hadleigh Park (Blythe Bridge); Moorfields Industrial Estate (Swynnerton); the former Meaford Power Station (Stone) for employment uses.</p>
3.78	<p>The draft NPPF makes provision for local affordable housing needs to be accommodated on previously developed land in the Green Belt provided that this does not have a greater impact on its openness.</p> <p>Question 29 <i>The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?</i></p> <p><u>DLE Response</u></p> <p>It is not apparent that exceptional circumstances exist to review the Green Belt. Even if such circumstances do emerge having regard to the need to meet the housing and employment growth needs of the borough, then the local plan must enshrine a principle that the major brownfield suitable development opportunities should be prioritised over against the release of Green Belt</p> <p>The major brownfield development opportunity at Cold Meece would assist the council in this regard in that it fully meets NPPF Para 117 in terms of making as much use as possible of previously used land.</p>
3.38	<p>Climate Change</p> <p>All development must incorporate sustainable design features to facilitate a reduction in the consumption of natural resources, improve the environmental quality and mitigate against the impact of climate change. This includes the provision of sustainable drainage, sustainable construction, recycling facilities and ensuring protection from flooding.</p> <p>Question 30 <i>Which renewable technologies do you think are most suitable for development in the Borough? Please provide additional information as to why you deem these to be suitable.</i></p> <p><u>DLE Response</u></p> <p>The renewable energy technology and energy market is fast growing and dynamic market. The local plan should ensure a flexible approach to renewable technologies to allow for the constant improvements of products. The principle of energy consumption</p>

	<p>being as efficient as possible and drawn from sustainable sources where possible should be supported in policy provided it is realistic to do so.</p>
	<p>Creating Successful Places</p> <p>Question 31 <i>This document sets out the issues that need to be addressed through the new Local Plan. There may be matters that have been missed or that are not covered by the other consultation questions. Are there any matters you think also need to be considered at this stage and why?</i></p> <p><u>DLE Response</u></p> <p>It is of fundamental importance that the ‘Developing a Vision & Objectives’ together with the related settlement Assessment Proforma embrace the possibility pursuing major brownfield development opportunities that do not directly accord with historic settlement hierarchy that has restricted growth to incremental development within or on the edge of those settlements.</p> <p>The spatial planning of the Borough must have regard to such opportunities. The council must devise a policy framework that can accommodate sustainable growth in these locations.</p> <p>It is also therefore essential the Sustainability Assessment Methodology is also formulated to enable appropriate testing of the benefits of such proposals that do not conform the historic approach taken in respect of the location of growth as set out within the adopted PSB1.</p> <p>The information produced by JAM Consult on behalf of Dean Lewis Estates provides our position on this specific and important matter.</p> <p>Dean Lewis Estates objective is to work collaboratively with Stafford Borough to ensure the 'presumption in favour of sustainable development' can be achieved within a policy context for the major brownfield development opportunity at Cold Meece.</p> <p>We firmly believe that, in the context of an appropriate supportive local plan policy approach, the sustainable development of Cold Mecce will effect a real change and restore the balance between social, economic and environmental needs for this part of the Borough.</p>

Sustainability Assessment

Cold Meece offers a substantial brownfield site which is well connected, adjacent to employment land and could provide the necessary homes, local services and facilities to deliver a sustainable community. The potential for such a site to deliver sustainable development needs to be recognised in the SA process.

When carrying out the Sustainability Appraisal (SA) of the Local Plan, it will be important that the methodology used enables the assessment of **ALL** reasonable alternatives to be assessed in a comparable way and to ensure that options, which are outside the Council's historic approach to the location of growth are judged on their merits in terms of the delivery of sustainable development.

In considering options for site allocations, the Sustainable Settlement Hierarchy should not be applied too rigidly. Any sites that fall outside the hierarchy, but which offer a viable and deliverable solution for sustainable development should also be considered in a comprehensive way. The Settlement Hierarchy should be a guide to the allocation of sites and not a constraint to sustainable growth.

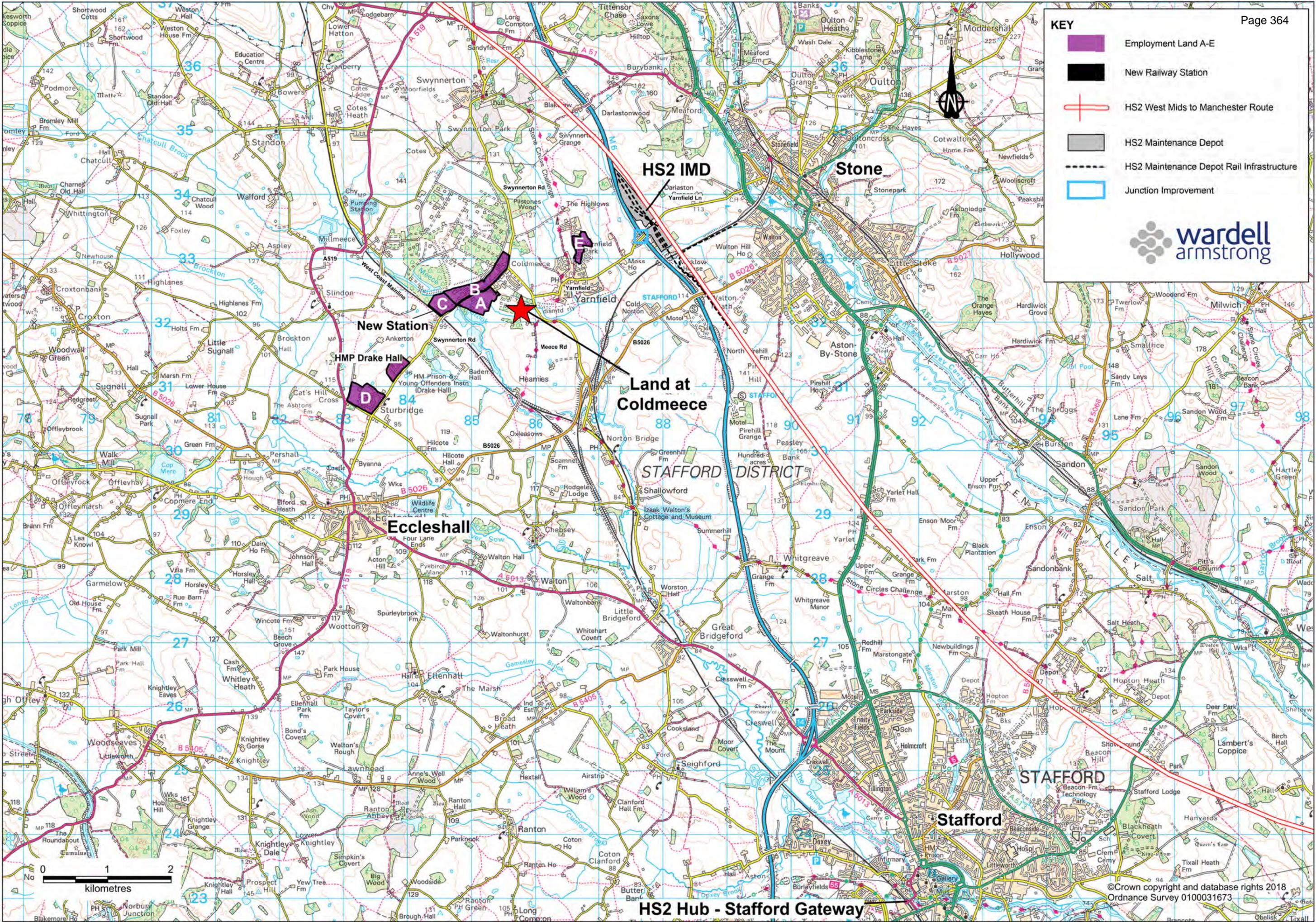
The methodology must ensure a balanced approach to the consideration of constraints and opportunities and give appropriate recognition to the positive and negative impacts of all options. The SA will need to be careful that the application of the Settlement Hierarchy does not focus too narrowly but instead acknowledges the geographical scope of the Plan, the wider benefits of sites, and their potential for the future growth of the Borough. The assessment must also consider how development will meet the core principles of the NPPF and the social, economic and environmental dimensions of sustainable development, as well as meeting the objectively assessed needs of the Borough.

It may be necessary to include a separate category in the assessment for sites that fall outside the settlement hierarchy but that still offer potential to deliver sustainable development by ensuring the effective use of land and providing sufficient land for additional growth e.g. the development of brownfield land such as Cold Meece or new settlements.

When undertaking the assessment care will need to be taken that the appraisal uses both qualitative and quantitative approaches, as appropriate, and that the results are supported by suitable evidence. Emphasis should not be simply on a 'tick box' exercise but should be supported by a suitable commentary that demonstrates the evidence to support the decisions made.

KEY

-  Employment Land A-E
-  New Railway Station
-  HS2 West Mids to Manchester Route
-  HS2 Maintenance Depot
-  HS2 Maintenance Depot Rail Infrastructure
-  Junction Improvement



HS2 Hub - Stafford Gateway

From: CANTRILL, James [REDACTED]
Sent: 18 September 2018 10:40
To: forwardplanningconsultations
Subject: Re: New Local Plan: Scoping the Issues - Consultation - Reply from Jeremy Lefroy MP
Attachments: Local Dev Plan - Sept 2018.docx

Dear Forward Planning,

Please find attached a response to the current consultation entitled 'New Local Plan: Scoping the Issues', from Jeremy Lefroy MP.

With kind regards

Best Wishes

James Cantrill

James Cantrill

Chief of Staff to Jeremy Lefroy MP, Stafford Constituency

[REDACTED]

[REDACTED]

[REDACTED]

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Question 1**What would you like the Borough to be like in the future?**

- A clean and green Borough which introduces a Green Belt between Stafford and Stone, and possibly elsewhere, to mark clear limits to development.
- A Borough which supports the growth of locally owned businesses as well as encouraging inward investment.
- A forward-looking Borough, setting up a 'jobs and livelihoods forum' to ensure that we are well-paced to meet the challenges and take up the opportunities of the Fourth Industrial Revolution. This forum should be focused and include private, public and voluntary sectors.
- A good place for children to grow up. We need further to improve sports facilities and revive community young people's clubs where they do not exist.
- A place which tackles loneliness, in particular among older people.
- A Borough which values physical and mental health and places emphasis on prevention as well as cure.
- A Borough in which no-one sleeps rough.
- A Borough which promotes clean transport, and encourages walking, cycling and public transport use.

Question 2**What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?**

- a) As close to full employment as possible with an emphasis on quality jobs.
- b) No rough sleeping and a home for all.
- c) Improved building quality.
- d) Good/outstanding schools and colleges for all children and young people.
- e) Good/outstanding health care at primary, secondary and tertiary level.
- f) Significantly improved levels of mental health.
- g) Improved cancer outcomes.
- h) Greatly reduced drug and alcohol abuse.
- i) Greatly reduced obesity
- j) Maintaining (or increasing) our high level of volunteering.
- k) Significantly better air quality, especially in towns.
- l) Zero tolerance of litter and fly-tipping

Question 3**Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighbourhood to make it a better place to live?**

- a) Even more interaction and mutual support between neighbours;
- b) Greater concern for the public environment.
- c) Cooperative working – for instance local credit unions, volunteering schemes.

Question 4**How could the new Local Plan support local villages and their communities to grow and thrive?**

- a) More say for local villages over development – provided that a certain sustainable amount of development is accepted.
- b) More input from local villages into the design and quality of housing built.

- c) Requiring greater contributions directly to villages by developers to be invested in local infrastructure, schools and health facilities.
- d) Ensuring that the local plan recognises the need to provide opportunity for businesses to be established and grow locally.

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

I have no specific comment on this.

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

- a) Brownfield sites for housing and employment should include empty retail property which are unlikely to be reused as retail. Stafford Town centre has many such sites which should be given priority for development.
- b) Greenfield sites should only be allocated for development when the supply of brownfield sites has clearly been exhausted. It makes no sense to continue to build on greenfield sites (other than those already allocated) on the outskirts of Stafford when there is the potential for considerable redevelopment for commercial and residential use.
- c) As stated above, the Borough should create Greenbelt land between Stafford and Stone to create boundaries to outward development.

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

- a) Single story accommodation without or with limited garden/patio space, particularly for older people who wish to stay in the area close to their families. With the age profile in the Borough, many will wish to downsize to such properties, freeing up larger family homes.
- b) Homes built specifically to permit working from home. These would have an office/study with bathroom facilities and a separate entrance. This would encourage entrepreneurs to set up or stay in the Borough. Such homes would also be suitable for a family which wished an older relative to live with them.
- c) The Borough should insist on a high quality of design and not simply accept the very limited range of designs which developers often propose. The Arts and Crafts Movement (of which Stafford has many fine examples) should be an inspiration.
- d) Homes should build in sustainability. Rainwater capture, solar panels and the most energy efficient glazing should be standard for all or almost all properties. These are much cheaper to build in when new than to retrofit.

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

I strongly agree that the new local plan should encourage self-build and at least 10% of all large sites should be put across for self-build. In addition, the Borough should look to acquire smaller sites for self-build. There is a considerable appetite for self-build among my constituents and this will only grow as people see the attraction of it. It will also provide work and employment to good local building firms.

Question 9

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing which includes pitches for gypsies, travellers and travelling show people. Where should the Council look for suitable brownfield sites for new pitches?

It is important to provide pitches for gypsies, travellers and travelling show people in areas which are suitable for them and the local community. At the same time, when such pitches are available, the Council should, with the Police, ensure that these pitches are used and that parks/communal grounds or private property (without permission from the owner) are not, with anyone trespassing being immediately moved on.

Question 10

What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

- a) Better transport infrastructure – both for both public and private transport – is essential. Improvements should be made before the start of any development, not halfway through or at the end.
- b) All developments should have the needs of pedestrians, cyclists and wheelchair users as a priority – not just as a consideration.
- c) All developments should be required to contribute to a public transport fund used to fund services such as community transport.
- d) Growth should be taken in a holistic sense and defined as such. It is important that it includes but is not restricted to economic growth. It should also include improvements to air quality, health and education – in other words, general well-being.

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

- a) As above, the Borough should consider that homes are also employment sites for millions of self-employed people in the UK. Therefore the strict segregation between housing and employment land is out of date. It is possible to create hundreds of additional job spaces in the Borough simply by implementing 7b) above.
- b) The Borough should resist any further developments for storage/distribution unless they are an essential part of other activities on the same or nearby sites such as manufacturing or R&D.
- c) The Borough should promote employment in (renewable) energy, data, high-value manufacturing, health, food production/processing, creative and professional services sectors – including research and development in all these areas.
- d) The Borough should encourage more sites for start-ups and growing businesses and consider developing these itself as a long-term investment.

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

Key challenges include

- a) The erosion of local services as (eg) banks consolidate their activities.
- b) Less access to public transport as bus services are removed or cut.

The Local Plan should identify which of these services are important for community life and ensure that they are made a priority.

Question 13

What improvements would you like to see in those centres that you visit regularly? Should additional uses be supported other than retail such as residential, entertainment and restaurants? Please state the name of the centre in your response.

I agree that additional uses should be supported, including community events. I have no specific recommendations.

Question 14

What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?

Leisure and sports facilities can be sited at secondary schools and made available both to schools and the community (as for instance at Wolgarston School in Penkridge).

Major retail development should be sited at existing locations rather than developing new sites (except for local retail outlets).

Question 15

Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres, and if so, where?

See answer to Q14.

Question 16

What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?

See answer to Q14. Stafford requires at least one more swimming pool which is open to the public. This could be sited at a secondary school. Stafford could also consider working with national sports bodies to build a 50m pool (perhaps at/near the County Showground) with the aim of attracting national and international meets.

Question 17

National policy gives councils new powers to protect valued open spaces by designating them as Local Green Spaces. Are there any open spaces that are special to your local community which should be designated? If yes, please provide details of the open space, its location and the reason why it is special to you and your community.

I believe the green area off Falmouth Avenue in Baswich should be protected as a community open space as I have already advocated.

Question 18

What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?

Additional primary and secondary school provision is required particularly in the North and West of Stafford. I understand this forms part of existing plans.

Stafford College requires additional support to ensure that students from Stafford have access to the widest possible range of apprenticeships/vocational qualifications.

Question 19

19a

What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?

19b

Where should these be located/go?

- a) Many Health Centres in the Borough require expansion and hence possible relocation – for instance Weeping Cross and Rising Brook.
- b) County Hospital's A&E department should be restored to 24/7 as soon as possible.
- c) Every new development of any size needs to have a community centre which can be multi-use – for instance by churches, clubs and other groups. Some school buildings can be used by the community at weekends and during holidays, providing them with additional income.

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

- a) Encouraging the use of electric/hybrid buses and cars through local regulations and provision of charging points.
- b) Adopting a zero-tolerance approach to litter and fly-tipping.

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

- a) See answer a) to Q20.
- b) Supporting the further development of a network of community transport to supplement commercial transport.
- c) Ensuring that the Borough develops and improves the cycling network and does not permit any further major developments which do not take sustainable transport seriously.

Question 22

Are there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

- a) See answer b) to Q21.
- b) Consider establishing a Borough-owned transport company to tackle 'market failure' on certain routes – or expanding community transport to do that.

- c) Producing and implementing a comprehensive plan for safe cycling throughout the Borough.

Question 23

What economic development opportunities do you consider could arise from HS2 for the Borough?

The opportunities will arise from development at and close to Stafford station. It is essential that HS2 is used to draw people to Stafford and the Borough for work rather than to make the Borough more of a commuting area to other places.

Question 24

Are there any specific transportation projects that the Council should be promoting in the Local Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.

- a) Development of community transport.
- b) Encouragement of low emission vehicles through (eg) provision of more charging points.
- c) Comprehensive plan for cycling.

Question 25

National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

Yes

Question 26

What could the Plan do to protect and enhance the Borough's Heritage Assets?

It could identify them and then describe action which can and will be taken – for instance, listing the buildings and producing clear plans on action for those which are empty or not fully used.

Question 27

What approach should the Local Plan take to ensure that Borough's landscape, AONB and its key features are protected and enhanced?

The Borough should again list in as much detail as possible all the landscapes and key features which are beautiful, significant, historic or remarkable in any way. It should then be a principle that these landscapes cannot be altered/affected without very good reason. In London, for instance, there are certain protected views which influence the siting, height and extent of new buildings.

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

Again the Local Plan should seek to list the natural assets which should be protected and enhanced so that any impact on them by a proposed development can be fully taken into account.

Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

Yes, a review is urgently needed and a new area of Green Belt between Stafford and Stone is required as stated above,

Question 30

Which renewable technologies do you think are most suitable for development in the Borough? Please provide additional information as to why you deem these to be suitable.

- a) Solar (photovoltaic and water heating), both as solar farms and as a requirement for new buildings. This is a technology which now requires little or no subsidy and can be used locally, reducing transmission losses.
- b) There remains scope for wind turbines across the Borough. This is currently the lowest cost renewable energy and its efficiency is constantly improving.
- c) Greater pressure on water supplies means that rainwater harvesting should be considered more widely.
- d) Waste to energy/anaerobic digestion is suitable where it uses genuine waste. However food production should be given priority on good agricultural land over crops grown for energy. The UK's food self-sufficiency is below 60%.

Question 31

This document sets out the issues that need to be addressed through the new Local Plan. There may be matters that have been missed or that are not covered by the other consultation questions. Are there any matters you think also need to be considered at this stage and why?

- a) It is vital that the Borough looks at new and imaginative ways to promote housing development. At the moment, developments are being driven by large developers marketing their land. However, some smaller landowners, who may have land in more convenient places for development, are being side lined or scared off by the larger developers, often because their land holding is too small or they don't have the overheads to go through the marketing themselves.

Although finances are tight, I would like the Borough Council to consider how they could either purchase or broker land that could be used for housing and/or employment and then develop it for the needs of the Borough, not the developer. Profits could be ploughed back into the Council and some Council housing could be considered.

- b) The Borough should consider much more joint working across Staffordshire to deliver services efficiently. I do not believe that a unitary council is necessarily the way forward as this would reduce local accountability. However the idea of a 'virtual unitary' with much greater cooperation between Boroughs/Districts, the County and the City of Stoke-on-Trent seems to me a sensible way forward. The savings made could be reinvested in services to the public.
- c) As mentioned in specific answers, I am very concerned about the erosion of public transport, particularly in rural and suburban areas. The Borough should consider a substantially larger community transport scheme, in cooperation with other Districts and the County.

From: Trudy Williams [REDACTED]
Sent: 18 September 2018 10:49
To: forwardplanningconsultations
Cc: [REDACTED]
Subject: New Local Plan Consultation: Scoping the Issues Report
Attachments: Scoping the Issues Consultation 18-09-18.pdf; 8a. Stone Town Council Neighbourhood Plan.pdf

Good morning

Please find attached a letter containing representations from Stone Town Council in response to the above consultation.

I have also attached a copy of the draft Stone Neighbourhood Plan for your information.

Thank you

Best regards

Trudy Williams

Trudy Williams | Assistant Town Clerk | [REDACTED]
[REDACTED]

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



18 September 2018

Dear Sir/madam,

New Local Plan Consultations
Scoping the Issues Report
Settlement Assessment with Settlement Profiles

Thank you for your email dated 18 July 2018 inviting Stone Town Council to submit comments in response to the planning consultations above.

At a meeting of Stone Town Council's General Purposes Committee on 4 September 2018, the Committee resolved to submit the following comments to Stafford Borough Council in respect of both consultations:

- Concern was expressed that any attempt to change the current policy regarding allocation of housing within the Settlement Boundary could remove any method of containing development in and around Stone in the future. The Settlement Boundaries currently define where development is or is not appropriate and also define the edge of the countryside.

In the case of Stone town, bearing in mind minimum housing targets for the current plan period have already been exceeded, there is no evidence that Settlement Boundaries aren't working; evidence is to the contrary. This might also be true for Stafford i.e. towns in the settlement Hierarchy in positions 1 and 2 could retain Settlement Boundaries and other methods of choosing site sustainability could be applied to Key Service Villages and others.

- Whilst Stafford Borough Council appear to have targets for housing and business development there appears to be no such target for green spaces.
- Members would like to have seen the evidence for the assumptions regarding future housing demand.
- There was concern that a new Plan for Stafford Borough, being more current than the town's Neighbourhood Plan, could undermine the work being done preparing the town's plan.

[Redacted signature block]

Town Clerk

- A copy of Stone Draft Neighbourhood Plan is submitted to Stafford Borough Council to illustrate the Town's view of land usage and green spaces in Stone.

Yours faithfully,



Les Trigg
Town Clerk



From: Sue Green [REDACTED]
Sent: 18 September 2018 11:12
To: forwardplanningconsultations
Subject: Stafford New Local Plan Scoping The Issues consultation
Attachments: Stafford New Local Plan Scoping The Issues consultation 18 September 2018.pdf

Dear Sir / Madam

For the Council's consideration please find attached the HBF response to the above mentioned consultation. If any further information or assistance is required please contact the undersigned.

Yours faithfully
For and on behalf of HBF

Sue Green

Planning Manager – Local Plans



HOME BUILDERS FEDERATION



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

SENT BY E-MAIL ONLY TO
[REDACTED]

18 September 2018

Dear Sir / Madam

STAFFORD NEW LOCAL PLAN SCOPING THE ISSUES CONSULTATION

Introduction

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

Developing a Vision & Key Objectives

Q2. What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

The new Stafford Local Plan should be prepared on the basis of joint working on cross boundary issues such as where housing needs cannot be wholly met within individual authorities. To fully meet the legal requirements of the Duty to Co-operate the Council should engage on a constructive, active and on-going basis with the neighbouring authorities to maximise the effectiveness of plan making. One key outcome from co-operation should be the meeting of objectively assessed housing needs (OAHN) in full. The National Planning Practice Guidance (NPPG) states that a key element of examination is ensuring that there is sufficient certainty through formal agreements that an effective strategy will be in place to deal with strategic matters such as unmet housing needs when Local Plans are adopted (ID 9-017). The new Local Plan should be accompanied by a Statement of Common Ground (SoCG) as set out in the revised National Planning Policy Framework (NPPF) (paras 24, 26 & 27).



The Local Plan Part 1 adopted in June 2014 and the Local Plan Part 2 adopted in January 2017 make provision for a minimum housing requirement for 10,000 dwellings (500 dwellings per annum) between 2011 – 2031 focussing development on the basis of a sustainable settlement hierarchy of Stafford, Stone and Key Service Villages. The HBF agree that the Council should revisit its previous goals considering both past and future successes and challenges. The spatial distribution of housing and the settlement hierarchy should provide sufficient opportunities to allow identified housing needs to be met in full by providing a clear framework to ensure that policies in the new Local Plan can be effectively applied.

The proposed timeframe of the new Local Plan of 2020 – 2040 should provide a period of at least 15 years after the adoption date of the new Local Plan as set out in the revised NPPF (para 22).

By the time of the submission of the new Stafford Local Plan for Examination the Government's standard methodology for the calculation of OAHN will have been implemented. The Government's proposed methodology is summarised as :-

- Demographic baseline based on annual average household growth over a 10 year period ;
- Workplace-based median house price to median earnings ratio ;
- Adjustment factor = $\frac{\text{Local affordability ratio} - 4}{4} \times 0.25$;
- Local Housing Need = (1 + adjustment factor) x projected household growth.

Using this standardised methodology the OAHN for Stafford is 423 dwellings per annum (based on 2014 data) which is lower than the adopted Local Plan housing requirement. However it should be remembered that the standard methodology is only a minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to this figure. The Government's objective of significantly boosting the supply of homes remains. It is important that future housing needs are not under-estimated.

Deciding Where Homes Should Go

Q4. How could the new Local Plan support local villages and their communities to grow and thrive?

It is important that the Council's proposed housing distribution re-considers the permitting of development adjacent to as well as within settlement boundaries which addresses the recognised difficulties facing rural communities in particular housing supply and affordability issues. The proposed distribution of housing should meet the housing needs of both urban and rural communities.

The relationship between the new Local Plan and Neighbourhood Plans should be clearly set out in accordance with the revised NPPF (paras 13, 29 & 30 and Footnote 16).

Making Effective Use of Land

Q5. Do you consider that the new Local Plan should set out a range of densities for the Borough and if so are there any specific locations?

The adopted Local Plan Policy states that development proposals should take account of local character, context and density which remain appropriate and relevant criteria. The HBF is supportive of the efficient use of land. The setting of any density standards in the new Local Plan should only be undertaken in accordance with the revised NPPF (para 123) in the circumstances of an existing or anticipated shortage of land for meeting identified housing needs. In such circumstances a minimum density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate. However a blanket approach to a minimum density across all the Borough would be inappropriate and unlikely to provide a variety of typologies to meet the housing needs of different groups. The inter-relationship between density, house size (any implications from the introduction of optional space and accessible / adaptable homes standards), house mix and developable acreage on viability should also be carefully considered especially if future development is located in less financially viable areas.

Prioritising Brownfield Land

Q6. National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

National policy does not state that the Council should prioritise brownfield sites. The revised NPPF states that the Council should make as much use as possible of previously developed land (para 117). However there are associated risks with an over reliance on brownfield sites because as a finite resource the availability of such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites and it may inhibit the delivery of affordable housing.

The strategic policies of the new Local Plan should provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period including planning for and allocating sufficient sites to deliver strategic priorities (revised NPPF para 23). The Council should have a clear understanding of land availability in the Borough by preparing a strategic housing land availability assessment which should be used to identify sufficient supply and mix of sites taking account of availability, suitability and economic viability. The policies of the new Local plan should identify a supply of specific

deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (revised NPPF para 67). The Council should also identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). The new Local Plan should include a trajectory illustrating the expected rate of housing delivery over the plan period. A minimum 5 years supply of specific deliverable sites including a buffer should be maintained (paras 73 & 74).

For the Council to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increasing housing supply is increasing the number of sales outlets whilst large strategic sites may have multiple outlets usually increasing the number of sales outlets available inevitably means increasing the number of housing site allocations. Large strategic sites should be complimented by smaller scale non-strategic sites. This approach is also advocated in the Housing White Paper “*Fixing the Broken Housing Market*” because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

The Council should also apply a flexibility contingency to its overall housing land supply (HLS) in order that the new Local Plan is responsive to changing circumstances and the housing requirement is treated as a minimum rather than a maximum ceiling. The HBF acknowledge that there can be no numerical formula to determine the appropriate quantum for a flexibility contingency but where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. As identified in Sir Oliver Letwin’s interim findings large housing sites may be held back by numerous constraints including discharge of pre-commencement planning conditions, limited availability of skilled labour, limited supplies of building materials, limited availability of capital, constrained logistics of sites, slow speed of installation by utility companies, difficulties of land remediation, provision of local transport infrastructure, absorption sales rates of open market housing and limitations on open market housing receipts to cross subsidise affordable housing. Therefore the HBF suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces. If during the new Local Plan Examination any of the Council’s assumptions on lapse rates, windfall allowances and delivery rates were to be adjusted or any proposed housing site allocations were to be found unsound then any proposed contingency would be eroded. The DCLG presentation slide from the HBF Planning Conference September 2015 (see below) which illustrates a 10 – 20% non-implementation gap together with 15 – 20% lapse rate. The slide also suggests “*the need to plan for permissions on more units than the housing start / completions ambition*”.

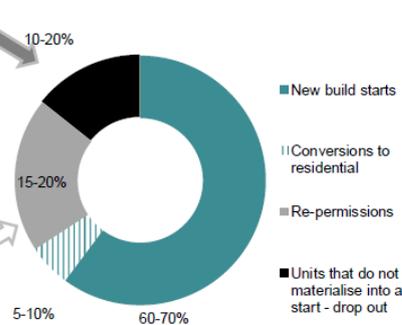


Department for
Communities and
Local Government

In recent years there has been a 30-40% gap between permissions and housing starts

- **Gap of around 30-40%** between the number of permissions given for housing and starts on site within a year. Estimate that for a year's permissions for housing around:
- **10-20%** do not materialise into a start; the permission 'drops out': this could be because -
 - the landowner cannot get the price for the site that they want
 - a developer cannot secure finance or meet the terms of an option
 - the development is later not considered to be financially worthwhile
 - there are supply chain constraints hindering a start.

There may be scope to reduce this through policy.
- **15-20%** are not abandoned but a **re-permission** is sought, for example to make a major change to plans or to extend the development period.
- Recent data and realities of private market suggests need to **plan for permissions on more units than housing start/completion ambition.**



Extract from slide presentation "DCLG Planning Update" by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

Deciding What Types of Homes to Build

Q7. National policy encourages Local Plan to plan positively for a mix of housing based on the demographic of people that live in the Borough both now and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

The preparation and review of housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned (revised NPPF para 31). The housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (revised NPPF paras 61 & 62).

The new Local Plan should deliver housing to meet the full range of local needs including affordable housing and specialist housing. The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as the elderly without seeking a specific housing mix on individual sites. Indeed the housing needs of older people is a diverse sector so the new Local Plan should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.

The Written Ministerial Statement dated 25th March 2015 stated that "*the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG*". If the Council wishes to adopt any of the higher optional standards for accessible

& adaptable homes and / or the Nationally Described Space Standard (NDSS) then the Council should only do so by applying the criteria set out in the NPPG. It is incumbent on the Council to provide a local assessment evidencing and justifying its case of the inclusion of such policy requirements and the quantum thereof. The Borough's ageing population is not unusual and is not a phenomenon specific to Stafford. The optional higher standards should only be introduced on a "need to have" rather than "nice to have" basis. The Council should also consider the potential unintended consequence of encouraging the under-occupation of its housing stock by discouraging older households from moving.

Q8. The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self-build. What are your thoughts on this and if you are supportive what percentage should be made available for dwelling plots?

The HBF is supportive of proposals to encourage self / custom build for its potential additional contribution to the overall housing supply. It is noted that policies which encourage self / custom build have been endorsed in a number of recently published Inspector's Final Reports for East Devon Local Plan, Warwick Local Plan, Bath & North East Somerset Place-making Plan and Derbyshire Dales Local Plan.

The HBF is not supportive of restrictive policy requirements for the inclusion of self / custom build housing on other residential development sites such as sites with a threshold greater than 20 dwellings under consideration by the Council. This approach only changes housing delivery from one form of house building company to another without any consequential additional contribution to boosting housing supply. If these plots are not developed by self / custom builders then these undeveloped plots are effectively removed from the HLS unless the Council provides a mechanism by which these dwellings may be developed by the original non self / custom builder in a timely manner. Before introducing any such policy the Council should also give consideration to the practicalities of health & safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. The NPPG confirms that *"different types of residential development such as those wanting to build their own homes ... are funded and delivered in different ways. This should be reflected in viability assessments"* (ID 10-009). The Council should also consider the impact of loss of Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt. Any policy requirement for self / custom build serviced plots on residential development sites should be fully justified and supported by evidence. If the Council wishes to promote self / custom build it should do so on the basis of evidence of need. The Council should assess such housing needs in its SHMA work as set out in the NPPG (ID 2a-021) collating from reliable local information (including the number of validated registrations on the Council's Self / Custom Build Register) the demand from people wishing to build their own homes. The Council should also analyse the preferences of entries on the Self Build Register often only individual plots in specific usually rural locations are sought as opposed to plots

on larger housing sites. The Register may not provide the justification for the Council's proposed policy approach for a percentage on other housing sites. Perhaps the Council should consider an alternative policy approach such as self / custom build plot exception sites in rural areas.

Conclusion

It is hoped that these responses will assist the Council in informing the next stages of the new Stafford Local Plan. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
Planning Manager – Local Plans

From: Ben Cook [REDACTED]
Sent: 18 September 2018 11:27
To: forwardplanningconsultations
Subject: New Local Plan: Scoping the Issues - Consultation - Horse Shoe, Gnosall
Attachments: P18-1804_ScopingResponseForm_180918.pdf; P18-1804_LPR_FINAL_RevA_180918_combined.pdf

Dear Sir/Madam,

Please find attached a representation on behalf of Richborough Estates in respect of the New Local Plan: Scoping the Issues – Consultation. The representation includes the promotion of Land at Horse Shoe, Gnosall, for residential development. To this end, the representation includes a site location plan and illustrative masterplan as appendices.

I trust the above and attached is clear and satisfactory, however, should you require anything else, please do not hesitate to contact me.

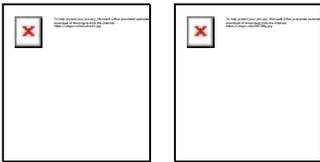
Kind regards,

Ben Cook
Senior Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

[REDACTED]

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Scoping The Issues Report: Response Form

Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Neil"/>
Last Name	<input type="text"/>	<input type="text" value="Cox"/>
Job Title (if applicable)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (if applicable)	<input type="text" value="Richborough Estates"/>	<input type="text" value="Pegasus Group"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
Address Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 3	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 4	<input type="text"/>	<input type="text" value="REDACTED"/>
Postcode	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail address	<input type="text"/>	<input type="text" value="REDACTED"/>

Name or Organisation	Neil Cox, Pegasus Group, on behalf of Richborough Estates
----------------------	---

Part B – Please use a separate sheet for each representation

Name or Organisation	Neil Cox, Pegasus Group, on behalf of Richborough Estates
-----------------------------	---

Question 1

What would you like the Borough to be like in the future?

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

Please see accompanying representation

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

Question 4

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

Please see accompanying representation

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

Please see accompanying representation

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

Please see accompanying representation

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

Please see accompanying representation

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Please see accompanying representation

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

Please see accompanying representation

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

Please see accompanying representation

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

Please see accompanying representation

Question 22

Any there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

Question 23

What economic development opportunities do you consider could arise from HS2 for the Borough?

Please see accompanying representation

Question 26

What could the Plan do to protect and enhance the Borough's Heritage Assets?

Please see accompanying representation

Question 27

What approach should the Local Plan take to ensure that Borough's landscape, Area of Outstanding Natural Beauty and its key features are protected and enhanced?

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

Please see accompanying representation

September 2018 | NCO/BC | P18-1804



STAFFORD BOROUGH NEW LOCAL PLAN

REGULATION 18 CONSULTATION (SCOPING THE ISSUES REPORT) JULY 2018

LAND AT HORSE SHOE, GNOSALL

ON BEHALF OF RICHBOROUGH ESTATES



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

Pegasus Group



PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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APPENDICES:

APPENDIX 1: SITE LOCATION PLAN

APPENDIX 2: ILLUSTRATIVE MASTERPLAN

1. INTRODUCTION

- 1.1 These representations are made by Pegasus Group on behalf of Richborough Estates Limited to the Stafford Borough New Local Plan, Regulation 18 (Scoping the Issues Report) Consultation. This representation relates to Land at Horse Shoe, Gnosall, which Richborough Estates is promoting for a residential development.
- 1.2 These representations respond to the following documents, including addressing the questions set out within the Local Plan Review Consultation Document:
- Stafford Borough Council New Local Plan Scoping the Issues Report, July 2018; and
 - Stafford Borough Council New Local Plan Settlement Assessment, July 2018
- 1.3 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2. SCOPING THE ISSUES REPORT

- 2.1 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 new Local Plan will guide where new development takes place across the Borough over the period 2020 – 2040. It is currently anticipated that the new Local Plan will be adopted in Autumn 2021.
- 2.2 Richborough Estates supports the proactive approach being taken by the Borough Council to ensure an up to date Plan is prepared so that growth is plan led. However, Richborough Estates raises concerns in respect of the identified Local Plan timetable, when contrasted with that of surrounding authority areas. It is considered that every effort should be made to expediate the new Local Plan, to bring the Plan Period forward into alignment with neighbouring authorities, due to the need to engage in cross-boundary strategic issues, as set out later within this representation.

Thinking Forward – Developing a Vision & Key Objectives

Question 2. What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

- 2.3 The new Local Plan should aspire to deliver housing and economic growth levels above the 'minimum' requirement identified through the standard method (as set out in national planning guidance). In doing so, the Local Plan will help to deliver sustainable growth outcomes, including supporting jobs and providing affordable housing. Furthermore, aspiring to deliver a greater level of growth will serve to support the needs of neighbouring authorities, as required by the Duty-to-Cooperate.

Key Policy Areas

Deciding Where Homes Should Go

Question 4. How could the new Local Plan support local villages and their communities to grow and thrive?

- 2.4 The adopted Local Plan for Stafford Borough seeks to deliver the majority of development at Stafford, Stone and the Key Service Villages. Other smaller

settlements in the Borough are not identified as delivering part of the housing requirement for the Borough. The new Local Plan for the Borough could support villages by attributing proportionate levels of housing growth to the settlements identified as being most sustainable, outside of the Key Service Villages. By planning positively for proportionate growth, the Council will allow local villages and communities to thrive economically, socially and environmentally, whilst avoiding less desirable, un-planned growth.

Making effective use of land

Question 5. Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

2.5 Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised '*where there is an existing or anticipated shortage of land*'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range across an entire local authority area. Richborough Estates would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character.

2.6 Regarding the application of such standards, Richborough Estates considers that any standard should be set within a Local Plan Policy rather than in a Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.

Prioritising Brownfield Land

Question 6. National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

- 2.7 If the housing and employment needs of the Borough cannot be met on brownfield land, then the Council should look to suitable greenfield sites in sustainable locations which could be brought forward for development.

Deciding What Types of Homes to Build

Question 7. National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

- 2.8 The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met need arising from neighbouring authorities. Richborough Estates submits that, whilst it is important to identify a wide range of sites for housing, larger sites of around 50 or more dwellings provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure.
- 2.9 Richborough Estates also submits that a specific housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead, Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the Plan Period. This ensures that housing mix is reflective of market-driven need.

Question 8. The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

- 2.10 Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. Authorities are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.
- 2.11 Given that authorities are required to maintain a register of demand for self-build housing, it would be inappropriate to include a blanket percentage within a Local Plan policy, particularly when the demand for self-build housing is susceptible to fluctuation through market demand. At any point during the plan period, it is

feasible that demand for self-build housing could fall, either in line with market conditions, or due to provision of a sufficient number of plots elsewhere within the Borough. In such a scenario, with a blanket percentage in force, further housing sites would come forward with self-build plots which have no realistic prospect of being developed. This approach would not, therefore, achieve the most efficient use of land, as required by the NPPF, to the detriment of the Borough's overall housing requirement.

- 2.12 Instead, it would be appropriate to secure self-build plots directly in line with demand. Policy should therefore be flexible and direct the reader to the most up-to-date evidence in respect of the demand for self-build plots, as per the requirements in respect of market and affordable housing mix.

Job Creation

Question 11. Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

- 2.13 Richborough Estates submits that identifying additional employment land to be delivered during the plan period is vital for supporting economic growth within the Borough, as well as to support the identified housing need arising both from within the Borough and from within neighbouring authorities. The Local Authority should utilise its evidence based to ascertain the amount and type of employment land required throughout the plan period.

Pollution and Air Quality

Question 20. What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

The new Local Plan should identify and deliver the most sustainable pattern of growth across the plan period. Significant development should be focused on locations which are, or can be made sustainable. Clearly there are sustainability advantages from directing development to locations such as Stafford and Stone but the NPPF also recognises the need to promote sustainable development in more rural areas, and that new housing should be located where it will enhance or maintain the vitality of rural communities. Consequently, there is also a role for villages in the delivery of new housing.

Sustainable Transport Choices

Question 21. There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

- 2.14 See response to Question 20.

Question 23. What economic development opportunities do you consider could arise from HS2 for the Borough?

- 2.15 HS2 represents a significant opportunity for promoting growth within the Borough, particularly at Stafford Town, which is identified as benefitting from a planned station stop, and Stone where there are proposals for a new maintenance depot. The new Local Plan should take this into account when considering the spatial distribution of residential and employment growth.

- 2.16 HS2 also has implications for Stafford Borough in respect of the level and amount of growth to be planned for in the new Local Plan. The standard method for calculating housing need introduced by the Government is based on demographic forecasts and does not take economic growth into consideration. It is widely acknowledged that HS2 is likely to result in economic growth and Stafford Borough Council should accordingly consider planning for growth above the minimum level identified by the methodology.

High quality Design

Question 25. National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

- 2.17 The new Local Plan should establish design principles but should not be prescriptive so as to stifle innovative design or flexibility, in accordance with Paragraph 127 of the NPPF.

The Green Belt

Question 29. The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than

a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

2.18 Whist less than a quarter of the Borough area may be identified as falling within the Green Belt, the Scoping the Issues Report correctly identifies a number of other European and World level constraints that exist within the Borough, including:

- Cannock Chase Special Area of Conservation (SAC)
- Chartley Moss SAC (under the West Midlands Meres and Mosses SAC)
- Pasturefields Salt Marsh SAC
- Cop Mere (under Midland Meres and Mosses Phase II Ramsar designation)
- Aqualate Mere (under Midland Meres and Mosses Phase II Ramsar designation)
- Mottey Meadows SAC (on the edge of the Borough)

2.19 There are therefore clearly a number of other constraints to development within the Borough, other than the Green Belt. Furthermore, the above constraints are statutory (legal) designations, in contrast to Green Belt, which is a 'policy-on' designation. As such, these designations benefit from a higher level of protection than the Green Belt.

2.20 As such, should it transpire that insufficient suitable sites are identified as being available for development in sustainable locations, it may be necessary to turn to sustainable locations within the Green Belt in order to meet any outstanding housing or employment need. It would therefore be prudent for the Local Authority to have an up to date evidence base in respect of the Green Belt, to allow the Authority to make the most appropriate decision regarding the spatial strategy, regardless of whether or not it is determined that exceptional circumstances exist to justify the release of Green Belt land.

3. SETTLEMENT ASSESSMENT

3.1 Stafford Borough Council has published a Settlement Assessment document which seeks to establish a methodology in order to determine the settlement hierarchy to be included within the new Local Plan.

3.2 The Assessment considered the settlements within the Borough in terms of availability of services and facilities and level of public transport provision. This is based primarily on an analysis of the number of dwellings, services and facilities in the settlement. Therefore, this study presents the analysis and evidence, with recommendations, to underpin the Settlement Hierarchy which is to be included in a policy of the new Local Plan and considered at the Issues and Option Stage.

3.3 The methodology for identifying a settlement hierarchy for Stafford Borough is as follows:

- 1) Identify all potential settlements in the Borough - this includes those villages identified Stafford Borough Local Plan 2001, additional villages identified by Parish Councils, and those settlements in the north of the Borough which form part of the North Staffordshire Urban Areas.
- 2) Identify the criteria to be used in allocating each settlement into one of the categories.
- 3) Categorise the settlements into a hierarchy.
- 4) Apply the criteria to each settlement using published data and other relevant sources of information, including where provided, the Parish Council survey.

3.4 The criteria used to assess each settlement as per point 4 above are as follows:

- a) Population (by ward).
- b) Number of dwellings (by OS plans).
- c) Relationship with the highway network.
- d) Access to employment opportunities up to 3km.
- e) Access to key facilities.
- f) Accessibility.

- g) Education.
- h) Reliance on the car.
- i) Technological Challenges and Opportunities.

3.5 Richborough Estates is generally supportive of the above approach. However, it is considered that several amendments should be made to consolidate the assessment.

3.6 Firstly, in respect of population and number of dwellings in each settlement, the Assessment incorrectly states that "*the Census 2011 is only ward based, it does not breakdown into parishes and in many instances, it includes one or more settlements. Therefore, it only provides specific data for the towns of Stafford and Stone.*" Population and dwelling house data is in fact available at the Parish level through Nomis¹ or, in instances where an area is not Parished, data is available by utilising super output areas.

3.7 It is therefore considered that the assessment should be revisited to consider population and dwelling house figures utilising census data. This is especially the case regarding the of number of dwelling houses per settlement, as this information is likely to be more accurate than counting from an OS map, which would not accurately depict the precise number of dwellings in an apartment block, for example.

3.8 It is also considered that the criteria of '*relationship with the highway network*' and '*reliance on the car*' can be amalgamated with '*accessibility*', as they are effectively ways of measuring accessibility. Indeed, in the individual settlement assessment profiles included at Appendix B, these matters are all considered under a single '*accessibility*' heading.

3.9 Similarly, it is considered that '*education*' can be amalgamated with '*access to key facilities*'. Again, later in the document, schools are included within the list of key facilities against which settlements are assessed.

3.10 The Assessment then goes on to propose that settlements are identified as falling within a 7-tier hierarchy as follows:

¹ www.nomisweb.co.uk

Tier	Settlement Category	Description
1	Stafford	Largest urban area with a regionally significant service centre role providing employment, retail and other facilities, and a key role in driving growth.
2	Stone	Large town providing employment, retail and other facilities for a wide area
3	North Staffordshire Urban Areas	These areas are located in the north of the Borough and include Trentham Gardens, Clayton, Meir Heath/Rough Close and Blythe Bridge.
4	Large Villages	Large villages of 500 or more dwellings which act as key service centres for the surrounding rural area by virtue of the range of services and facilities they possess
5	Medium Villages	Villages of 250 or more dwellings which tend to have a lesser provision of services than larger villages that share services with nearby villages
6	Small Villages	Small villages with a definable village nucleus (i.e. not dispersed or ribbon development) of 50 or more dwellings with fewer services available.
7	Rest of the Borough	Development elsewhere (i.e. in an area not falling into one of the above categories). 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'.

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 wide area.
3	North Staffordshire Urban Areas	These areas are located in the north of the Borough and include Trentham Gardens; Clayton; Meir Heath/Rough Close; and Blythe Bridge.
4	Large Villages (500+ Houses)	Barlaston, Eccleshall, Gnosall, Great Haywood, Hixon, Little Haywood and Colwich, Yarnfield
5	Medium Villages (250+ Houses)	Barlaston Park, Brocton, Brocton A34, Derrington, Fulford, Great Bridgeford, Haughton, Tittensor, Weston, Woodseaves
6	Small Villages (50+ Houses)	Adbaston, Aston-by-Stone, Bradley, Church Eaton, Cold Meece, Cotes Heath, Creswell, Croxton, Gayton, Hilderstone, Hopton, Hyde Lea, Ingestre, Milford, Milwich, Moreton, Norbury, Norton Bridge, Oulton, Ranton, Salt, Seighford, Stallington, Swynnerton.

-
- 3.11 Richborough Estates submits that this settlement hierarchy should be revisited, as there is little justification to explain as to how the threshold for each tier/category has been determined. For example Weston has slipped from being a Key Service Village (a village which the current Development Plan notes as having a primary school, local retailing, some healthcare provision and good links to Hixon's industrial estates) to a 5th tier settlement.
- 3.12 Furthermore, it appears that the threshold for each tier is based solely on the number of dwellings that currently exist within each settlement. This does not take into consideration the assessment criteria as set out earlier within the Assessment and is a poor indicator of the overall sustainability level of each settlement. For example, a settlement may have a relatively low number of dwellings, but benefit from a higher level of employment opportunities, services, facilities and public transport opportunities. Such a settlement would therefore be a sustainable location for development but would instead sit near the foot of the above hierarchy. Conversely, a larger settlement in terms of dwelling numbers may not benefit from as many employment opportunities, services, facilities and public transport opportunities and would therefore be a less sustainable location for development.
- 3.13 It is therefore submitted that the Council should revisit the Settlement Profiles Contained within Appendix B of the Assessment and should seek to attribute a score to each settlement, based upon the assessment criteria identified above. The Settlements can then be justifiably attributed to a specific tier in the hierarchy, based upon the sustainability of each settlement.

4. LAND AT HORSE SHOE, GNOSALL

- 4.1 Richborough Estates is promoting Land at Horse Shoe, Gnosall, for residential development. It is anticipated that the site can accommodate approximately 55 dwellings. A Site Location Plan and Illustrative Masterplan are included at Appendix 1 and Appendix 2 to this representation.

APPENDIX 1 – SITE LOCATION PLAN

APPENDIX 2 – ILLUSTRATIVE MASTERPLAN

The Site

- 4.2 The site comprises approximately 5.57 hectares of land, located to the north-eastern edge of Gnosall. The site is currently in agricultural use.
- 4.3 The site comprises two improved pasture fields separated by a mature hedgerow. The perimeter of the site is also bounded by mature hedgerows, with some garden fences. There are several trees scattered within the existing hedgerow.
- 4.4 Approximately half the site is bounded by a single carriageway highway which is known locally as the Audmore Loop or Horse Shoe. The remainder of the site is either adjoining existing residential development or pasture land.

The Surrounding Area

- 4.5 The surrounding area is predominantly residential in character, with the built-up area comprised of housing, services and employment areas. The Site is not located in close proximity to any Conservation Areas or areas of landscape or other sensitivity. A listed building is located approximately 200m to the west of the site access, immediately adjacent to the level crossing on Uttoxeter Road, but it is not visible from the site.
- 4.6 The Site is in close proximity to a range of shops, services and employment areas. In particular, the site is approximately 2km from Stone town centre, which provides a range of shops and services, including food stores, post offices and other day-to-day facilities. The site is also located approximately 1.6km from Stone Business Park which includes a range of industrial and commercial businesses.

Sustainable Travel

- 4.7 There are a range of local facilities near to the site.
- 4.8 Gnosall benefits from a wide range of services and facilities. The services and facilities listed below are located within 1.5km of existing residential properties and the proposed development site, which is well below recommended maximum acceptable walking distances for common trip purposes:
- Medical facilities
 - Educational facilities
 - Convenience store
 - Post Office
 - Local Bus Services
 - Library facilities
 - Formal and informal plays areas and sports pitches
 - Community buildings, including village hall
 - Churches
 - Pubs and restaurants
 - Petrol Station
- 4.9 It is generally accepted that a walking distance of up to 2km to jobs and schools and 1.2km to other locations (such as local shops) is sustainable and acceptable. Given the distances referred to above, it is therefore considered that the site is sustainably located.
- 4.10 The site benefits from genuine opportunities to utilise sustainable transport modes, including a twice-hourly bus service between Telford and Stafford town centre, with the nearest stops located approximately 300m from the site

Access

- 4.11 Initial highways consideration confirms that a safe and suitable access can be provided to the site via T-junction from Horse Shoe. Additionally, the existing public right of way can be retained and incorporated into the site layout, as well as new internal footpath connections.

Flood Risk and Drainage

- 4.12 Based on the Environment Agency's Flood Map for planning, the site is shown to be located within Flood Zone 1; land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%), and therefore is suitable for residential development.
- 4.13 The site is capable of being development in such a way so as to not increase the risk of flooding associated with surface water run-off. Any development would incorporate SUDS in accordance with Local Plan Policy N2 and include an additional 30% allowance to accommodate the effects of climate change.

Indicative Proposal

- 4.14 To accompany these representations, an indicative masterplan has been prepared, including at **Appendix 2**. This has been prepared having regard to existing constraints, as well as relevant planning policy and guidance.
- 4.15 The indicative masterplan identifies the following key features:
- Delivery of approximately 55 dwellings, provided at a gross density of 9.87 dwellings per hectare (24.2 dwellings per hectare net);
 - Access from Horse Shoe;
 - 3.3 Ha of public open space, including provision of a community green and retaining existing vegetation wherever possible; and
 - Attenuation pond to western edge of site.
- 4.16 The layout has been designed so as to include extensive areas of public open space throughout the site, reflective of the character of the site on the edge of the settlement, assisting with the transition to the open countryside. Blocks have been

orientated to create a soft edge to the development. Creating a positive interface between the proposed development and the surrounding countryside.

- 4.17 Additionally, the layout seeks to retain and supplement existing vegetation wherever possible, including the existing hedgerow to the southern edge of the site which would be retained, in addition the hedgerow which bisects the centre of the site. This will allow for considerable levels of habitat and buffer planting to help support local wildlife and reduce the visual impact of the proposed development. A community green is also provided to the south-western corner of the site, for use by both existing and future residents of Gnosall.
- 4.18 This layout ensures the most efficient use of the site area, whilst retaining natural features of value, without compromising the visual amenity of the wider area when viewed from the surrounding countryside.

Suitability

- 4.19 The indicative masterplan demonstrates how a scheme for approximately 55 dwellings can be achieved having regard to development design guidelines and development standards currently utilised by the Council. The proposal is sustainable and represents a logical extension to the settlement of Gnosall.

Deliverability

- 4.20 Further technical work can be commissioned to further demonstrate the deliverability of this site. However, initial technical work in relation to the key disciplines undertaken to date confirms there are no constraints likely to render the site undeliverable in the Plan period. The site is available now.
- 4.21 There are no existing uses that would require relocation and no issues of contamination that would require remediation.
- 4.22 The site is deliverable and immediately available and, subject to allocation, could deliver homes and associated community benefits within the next 5 years.

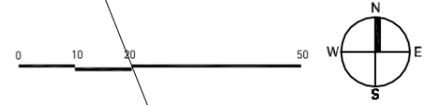
5. CONCLUSION

- 5.1 Richborough Estates is promoting Land at Horse Shoe, Gnosall, for residential development. The site is sustainably located adjacent to the existing settlement boundary for Gnosall, which is identified as a Key Service Village in the adopted Local Plan. This site is available and deliverable.
- 5.2 An Illustrative Masterplan is appended to this Representation which demonstrates how the site might come forward for development in a sustainable and suitable manner.
- 5.3 Richborough Estates welcomes the opportunity to comment at this early stage in the new Local Plan. If the Council requires any further information in respect of the site to assist in the accurate assessment of the site, this can be provided upon request.

APPENDIX 1

SITE LOCATION PLAN

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SITE LOCATION
13.77 ACRES/ 5.57 HECTARES

REVISION A: 13.10.2014
RED LINE BOUNDARY UPDATED IN ACCORDANCE
WITH DRWG BIR.4423_16A

LAND AT HORSESHOE, AUDMORE, GNOSALL SITE LOCATION PLAN



APPENDIX 2

ILLUSTRATIVE MASTERPLAN

From: Ben Cook [REDACTED]
Sent: 18 September 2018 11:28
To: forwardplanningconsultations
Subject: New Local Plan: Scoping the Issues - Consultation - Green Road/A51, Weston
Attachments: P16-1009_LPR_FINAL_RevA_180918_combined.pdf; P16-1009_ScopingResponseForm_180918.pdf

Dear Sir/Madam,

Please find attached a representation on behalf of Richborough Estates in respect of the New Local Plan: Scoping the Issues – Consultation. The representation includes the promotion of Land at Green Road, Weston, and Land South-West of the A51, Weston, for residential development. To this end, the representation includes a site location plan for both sites as appendices. These sites are capable of coming forward individually or as a single combined site.

I trust the above and attached is clear and satisfactory, however, should you require anything else, please do not hesitate to contact me.

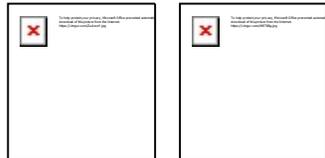
Kind regards,

Ben Cook
Senior Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

[REDACTED]

  [REDACTED]
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Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Neil"/>
Last Name	<input type="text"/>	<input type="text" value="Cox"/>
Job Title (if applicable)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (if applicable)	<input type="text" value="Richborough Estates"/>	<input type="text" value="Pegasus Group"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
Address Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 3	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 4	<input type="text"/>	<input type="text" value="REDACTED"/>
Postcode	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail address	<input type="text"/>	<input type="text" value="REDACTED"/>

Name or Organisation	Neil Cox, Pegasus Group, on behalf of Richborough Estates
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Part B – Please use a separate sheet for each representation**Name or Organisation**

Neil Cox, Pegasus Group, on behalf of Richborough Estates

Question 1

What would you like the Borough to be like in the future?

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

Please see accompanying representation

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

Question 4

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

Please see accompanying representation

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

Please see accompanying representation

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

Please see accompanying representation

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

Please see accompanying representation

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Please see accompanying representation

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

Please see accompanying representation

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

Please see accompanying representation

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

Please see accompanying representation

Question 22

Any there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

Question 23

What economic development opportunities do you consider could arise from HS2 for the Borough?

Please see accompanying representation

Question 26

What could the Plan do to protect and enhance the Borough's Heritage Assets?

Please see accompanying representation

Question 27

What approach should the Local Plan take to ensure that Borough's landscape, Area of Outstanding Natural Beauty and its key features are protected and enhanced?

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

Please see accompanying representation

September 2018 | NCO/BC | P16-1009



STAFFORD BOROUGH NEW LOCAL PLAN

REGULATION 18 CONSULTATION (SCOPING THE ISSUES REPORT) JULY 2018

GREEN ROAD, WESTON

ON BEHALF OF RICHBOROUGH ESTATES



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

Pegasus Group



PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

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APPENDICES:

APPENDIX 1: SITE LOCATION PLAN; SOUTH OF GREEN ROAD

APPENDIX 2: SITE LOCATION PLAN; SOUTH-WEST OF A51

1. INTRODUCTION

- 1.1 These representations are made by Pegasus Group on behalf of Richborough Estates Limited to the Stafford Borough New Local Plan, Regulation 18 (Scoping the Issues Report) Consultation. This representation relates to land off Green Road, Weston, which Richborough Estates is promoting for a residential development.
- 1.2 These representations respond to the following documents, including addressing the questions set out within the Local Plan Review Consultation Document:
- Stafford Borough Council New Local Plan Scoping the Issues Report, July 2018; and
 - Stafford Borough Council New Local Plan Settlement Assessment, July 2018
- 1.3 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2. SCOPING THE ISSUES REPORT

- 2.1 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 new Local Plan will guide where new development takes place across the Borough over the period 2020 – 2040. It is currently anticipated that the new Local Plan will be adopted in Autumn 2021.
- 2.2 Richborough Estates supports the proactive approach being taken by the Borough Council to ensure an up to date Plan is prepared so that growth is plan led. However, Richborough Estates raises concerns in respect of the identified Local Plan timetable, when contrasted with that of surrounding authority areas. It is considered that every effort should be made to expediate the new Local Plan, to bring the Plan Period forward into alignment with neighbouring authorities, due to the need to engage in cross-boundary strategic issues, as set out later within this representation.

Thinking Forward – Developing a Vision & Key Objectives

Question 2. What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

- 2.3 The new Local Plan should aspire to deliver housing and economic growth levels above the ‘minimum’ requirement identified through the standard method (as set out in national planning guidance). In doing so, the Local Plan will help to deliver sustainable growth outcomes, including supporting jobs and providing affordable housing. Furthermore, aspiring to deliver a greater level of growth will serve to support the needs of neighbouring authorities, as required by the Duty-to-Cooperate.

Key Policy Areas

Deciding Where Homes Should Go

Question 4. How could the new Local Plan support local villages and their communities to grow and thrive?

- 2.4 The adopted Local Plan for Stafford Borough seeks to deliver the majority of development at Stafford, Stone and the Key Service Villages. Other smaller

settlements in the Borough are not identified as delivering part of the housing requirement for the Borough. The new Local Plan for the Borough could support villages by attributing proportionate levels of housing growth to the settlements identified as being most sustainable, outside of the Key Service Villages. By planning positively for proportionate growth, the Council will allow local villages and communities to thrive economically, socially and environmentally, whilst avoiding less desirable, un-planned growth.

Making effective use of land

Question 5. Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

2.5 Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised '*where there is an existing or anticipated shortage of land*'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range across an entire local authority area. Richborough Estates would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character.

2.6 Regarding the application of such standards, Richborough Estates considers that any standard should be set within a Local Plan Policy rather than in a Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.

Prioritising Brownfield Land

Question 6. National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

- 2.7 If the housing and employment needs of the Borough cannot be met on brownfield land, then the Council should look to suitable greenfield sites in sustainable locations which could be brought forward for development.

Deciding What Types of Homes to Build

Question 7. National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

- 2.8 The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met need arising from neighbouring authorities. Richborough Estates submits that, whilst it is important to identify a wide range of sites for housing, larger sites of around 50 or more dwellings provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure.
- 2.9 Richborough Estates also submits that a specific housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead, Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the Plan Period. This ensures that housing mix is reflective of market-driven need.

Question 8. The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

- 2.10 Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. Authorities are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.
- 2.11 Given that authorities are required to maintain a register of demand for self-build housing, it would be inappropriate to include a blanket percentage within a Local

Plan policy, particularly when the demand for self-build housing is susceptible to fluctuation through market demand. At any point during the plan period, it is feasible that demand for self-build housing could fall, either in line with market conditions, or due to provision of a sufficient number of plots elsewhere within the Borough. In such a scenario, with a blanket percentage in force, further housing sites would come forward with self-build plots which have no realistic prospect of being developed. This approach would not, therefore, achieve the most efficient use of land, as required by the NPPF, to the detriment of the Borough's overall housing requirement.

- 2.12 Instead, it would be appropriate to secure self-build plots directly in line with demand. Policy should therefore be flexible and direct the reader to the most up-to-date evidence in respect of the demand for self-build plots, as per the requirements in respect of market and affordable housing mix.

Job Creation

Question 11. Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

- 2.13 Richborough Estates submits that identifying additional employment land to be delivered during the plan period is vital for supporting economic growth within the Borough, as well as to support the identified housing need arising both from within the Borough and from within neighbouring authorities. The Local Authority should utilise its evidence based to ascertain the amount and type of employment land required throughout the plan period.

Pollution and Air Quality

Question 20. What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

The new Local Plan should identify and deliver the most sustainable pattern of growth across the plan period. Significant development should be focused on locations which are, or can be made sustainable. Clearly there are sustainability advantages from directing development to locations such as Stafford and Stone but the NPPF also recognises the need to promote sustainable development in more rural areas, and that new housing should be located where it will enhance

or maintain the vitality of rural communities. Consequently there is also a role for villages in the delivery of new housing.

Sustainable Transport Choices

Question 21. There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

2.14 See response to Question 20.

Question 23. What economic development opportunities do you consider could arise from HS2 for the Borough?

2.15 HS2 represents a significant opportunity for promoting growth within the Borough, particularly at Stafford Town, which is identified as benefitting from a planned station stop, and Stone where there are proposals for a new maintenance depot. The new Local Plan should take this into account when considering the spatial distribution of residential and employment growth.,

2.16 HS2 also has implications for Stafford Borough in respect of the level and amount of growth to be planned for in the new Local Plan. The standard method for calculating housing need introduced by the Government is based on demographic forecasts and does not take economic growth into consideration. It is widely acknowledged that HS2 is likely to result in economic growth and Stafford Borough Council should accordingly consider planning for growth above the minimum level identified by the methodology.

High quality Design

Question 25. National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

2.17 The new Local Plan should establish design principles but should not be prescriptive so as to stifle innovative design or flexibility, in accordance with Paragraph 127 of the NPPF.

The Green Belt

Question 29. The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

2.18 Whist less than a quarter of the Borough area may be identified as falling within the Green Belt, the Scoping the Issues Report correctly identifies a number of other European and World level constraints that exist within the Borough, including:

- Cannock Chase Special Area of Conservation (SAC)
- Chartley Moss SAC (under the West Midlands Meres and Mosses SAC)
- Pasturefields Salt Marsh SAC
- Cop Mere (under Midland Meres and Mosses Phase II Ramsar designation)
- Aqualate Mere (under Midland Meres and Mosses Phase II Ramsar designation)
- Mottey Meadows SAC (on the edge of the Borough)

2.19 There are therefore clearly a number of other constraints to development within the Borough, other than the Green Belt. Furthermore, the above constraints are statutory (legal) designations, in contrast to Green Belt, which is a 'policy-on' designation. As such, these designations benefit from a higher level of protection than the Green Belt.

2.20 As such, should it transpire that insufficient suitable sites are identified as being available for development in sustainable locations, it may be necessary to turn to sustainable locations within the Green Belt in order to meet any outstanding housing or employment need. It would therefore be prudent for the Local Authority to have an up to date evidence base in respect of the Green Belt, to allow the Authority to make the most appropriate decision regarding the spatial strategy, regardless of whether or not it is determined that exceptional circumstances exist to justify the release of Green Belt land.

3. SETTLEMENT ASSESSMENT

3.1 Stafford Borough Council has published a Settlement Assessment document which seeks to establish a methodology in order to determine the settlement hierarchy to be included within the new Local Plan.

3.2 The Assessment considered the settlements within the Borough in terms of availability of services and facilities and level of public transport provision. This is based primarily on an analysis of the number of dwellings, services and facilities in the settlement. Therefore, this study presents the analysis and evidence, with recommendations, to underpin the Settlement Hierarchy which is to be included in a policy of the new Local Plan and considered at the Issues and Option Stage.

3.3 The methodology for identifying a settlement hierarchy for Stafford Borough is as follows:

- 1) Identify all potential settlements in the Borough - this includes those villages identified Stafford Borough Local Plan 2001, additional villages identified by Parish Councils, and those settlements in the north of the Borough which form part of the North Staffordshire Urban Areas.
- 2) Identify the criteria to be used in allocating each settlement into one of the categories.
- 3) Categorise the settlements into a hierarchy.
- 4) Apply the criteria to each settlement using published data and other relevant sources of information, including where provided, the Parish Council survey.

3.4 The criteria used to assess each settlement as per point 4 above are as follows:

- a) Population (by ward).
- b) Number of dwellings (by OS plans).
- c) Relationship with the highway network.
- d) Access to employment opportunities up to 3km.
- e) Access to key facilities.

- f) Accessibility.
- g) Education.
- h) Reliance on the car.
- i) Technological Challenges and Opportunities.

3.5 Richborough Estates is generally supportive of the above approach. However, it is considered that several amendments should be made to consolidate the assessment.

3.6 Firstly, in respect of population and number of dwellings in each settlement, the Assessment incorrectly states that *"the Census 2011 is only ward based, it does not breakdown into parishes and in many instances, it includes one or more settlements. Therefore, it only provides specific data for the towns of Stafford and Stone."* Population and dwelling house data is in fact available at the Parish level through Nomis¹ or, in instances where an area is not Parished, data is available by utilising super output areas.

3.7 It is therefore considered that the assessment should be revisited to consider population and dwelling house figures utilising census data. This is especially the case regarding the of number of dwelling houses per settlement, as this information is likely to be more accurate than counting from an OS map, which would not accurately depict the precise number of dwellings in an apartment block, for example.

3.8 It is also considered that the criteria of *'relationship with the highway network'* and *'reliance on the car'* can be amalgamated with *'accessibility'*, as they are effectively ways of measuring accessibility. Indeed, in the individual settlement assessment profiles included at Appendix B, these matters are all considered under a single *'accessibility'* heading.

3.9 Similarly, it is considered that *'education'* can be amalgamated with *'access to key facilities'*. Again, later in the document, schools are included within the list of key facilities against which settlements are assessed.

¹ www.nomisweb.co.uk

3.10 The Assessment then goes on to propose that settlements are identified as falling within a 7-tier hierarchy as follows:

Tier	Settlement Category	Description
1	Stafford	Largest urban area with a regionally significant service centre role providing employment, retail and other facilities, and a key role in driving growth.
2	Stone	Large town providing employment, retail and other facilities for a wide area
3	North Staffordshire Urban Areas	These areas are located in the north of the Borough and include Trentham Gardens, Clayton, Meir Heath/Rough Close and Blythe Bridge.
4	Large Villages	Large villages of 500 or more dwellings which act as key service centres for the surrounding rural area by virtue of the range of services and facilities they possess
5	Medium Villages	Villages of 250 or more dwellings which tend to have a lesser provision of services than larger villages that share services with nearby villages
6	Small Villages	Small villages with a definable village nucleus (i.e. not dispersed or ribbon development) of 50 or more dwellings with fewer services available.
7	Rest of the Borough	Development elsewhere (i.e. in an area not falling into one of the above categories). 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'.

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 wide area.
3	North Staffordshire Urban Areas	These areas are located in the north of the Borough and include Trentham Gardens; Clayton; Meir Heath/Rough Close; and Blythe Bridge.
4	Large Villages (500+ Houses)	Barlaston, Eccleshall, Gnosall, Great Haywood, Hixon, Little Haywood and Colwich, Yarnfield
5	Medium Villages (250+ Houses)	Barlaston Park, Brocton, Brocton A34, Derrington, Fulford, Great Bridgeford, Haughton, Tittensor, Weston, Woodseaves
6	Small Villages (50+ Houses)	Adbaston, Aston-by-Stone, Bradley, Church Eaton, Cold Meece, Cotes Heath, Creswell, Croxton, Gayton, Hilderstone, Hopton, Hyde Lea, Ingestre, Milford, Milwich, Moreton, Norbury, Norton Bridge, Oulton, Ranton, Salt, Seighford, Stallington, Swynnerton.

3.11 Richborough Estates submits that this settlement hierarchy should be revisited, as there is little justification to explain as to how the threshold for each tier/category has been determined. For example Weston has slipped from being a Key Service Village (a village which the current Development Plan notes as having

a primary school, local retailing, some healthcare provision and good links to Hixon's industrial estates) to a 5th tier settlement.

- 3.12 Furthermore, it appears that the threshold for each tier is based solely on the number of dwellings that currently exist within each settlement. This does not take into consideration the assessment criteria as set out earlier within the Assessment and is a poor indicator of the overall sustainability level of each settlement. For example, a settlement may have a relatively low number of dwellings, but benefit from a higher level of employment opportunities, services, facilities and public transport opportunities. Such a settlement would therefore be a sustainable location for development but would instead sit near the foot of the above hierarchy. Conversely, a larger settlement in terms of dwelling numbers may not benefit from as many employment opportunities, services, facilities and public transport opportunities and would therefore be a less sustainable location for development.
- 3.13 It is therefore submitted that the Council should revisit the Settlement Profiles Contained within Appendix B of the Assessment and should seek to attribute a score to each settlement, based upon the assessment criteria identified above. The Settlements can then be justifiably attributed to a specific tier in the hierarchy, based upon the sustainability of each settlement.

4. LAND AT GREEN ROAD, WESTON

4.1 Richborough Estates is promoting two sites at Green Road, Weston, for residential development. The first is located immediately south of Green Road, comprising approximately 1.55ha of land. The second is located immediately south-west of the A51 and north-east of the Trent and Mersey Canal. This site extends to approximately 13.9ha. A site location plan for each site is included at **Appendix 1** and **Appendix 2** respectively. A third option is a combination of the two and this would deliver a sizable area of public open space alongside residential development.

APPENDIX 1 – SITE LOCATION PLAN; SOUTH OF GREEN ROAD

APPENDIX 2 – SITE LOCATION PLAN; SOUTH WEST OF A51

Land South of Green Road

- 4.2 The site comprises approximately 1.55 hectares of land to the south of Green Road, Weston. The site is currently in agricultural use, accessed via an existing access off Salt Works Lane to the west of the site. The site is bounded by residential development to the north, east and west. It is submitted that the site can accommodate 30-50 dwellings.
- 4.3 The site is identified as Grade 3 quality agricultural land on the Provisional ALC map, however these maps aren't suitable for establishing the quality of individual sites. Further survey work can be undertaken as necessary in due course.
- 4.4 The site is located in Flood Zone 1, the area at least risk from flooding. The site is also flat and not constrained topographically. The site is not located within the Green Belt. There are no other known environmental constraints which would preclude the development of the site.
- 4.5 There are no heritage assets on or in the immediate vicinity of the site. The nearest heritage asset is a Grade II listed building known as 'Abbeylands', located approximately 400m north-west of the site.

Sustainability

- 4.6 The site is sustainably located immediately adjacent to Key Service Village of Weston. In terms of services, St Andrews C of E Primary School is located

approximately 200m to the north of the site, whilst Weston also benefits from two public houses, a village hall and a church.

- 4.7 The site is therefore well located in terms of access to local facilities and services.
- 4.8 In terms of public transport, a number of bus services run along the A518 between Stafford, Longton (Stoke-on-Trent) and Rugeley. These services run approximately 5 times per day.
- 4.9 The site therefore benefits from significant and genuine opportunities to utilise transport modes other than the private car.

Development Constraints

- 4.10 The site is located in Flood Zone 1, the area at least risk from flooding, and there are no heritage assets located on or in the immediate vicinity to the site. The site is not constrained topographically and there are no other constraints which might preclude development.
- 4.11 Further technical information will be undertaken as required to help inform the plan-making process.

Demonstrating Deliverability

- 4.12 Footnote 11 to Paragraph 47 of the NPPF states that in order to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. The paragraphs below demonstrate how the site is suitable, available and achievable to accommodate residential development.

Availability:

- 4.13 Through the continued promotion of this site, the landowner has demonstrated that they are supportive of the development of the site to deliver much needed new homes.
- 4.14 As such, this submission confirms that there is nothing to prevent this site from being delivered immediately.
- 4.15 The site can therefore be considered to be available.

Suitability:

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

Achievability:

- 4.17 It has been demonstrated that there are no constraints which would preclude the development of the site.
- 4.18 In terms of access, an existing access exists at the site's western boundary off Salt Works Lane, whilst there is the opportunity to provide an additional access off Green Road.
- 4.19 The site is therefore not subject to any major physical constraints which would prevent development from being achieved.

Summary

- 4.20 To conclude, Land South of Green Road, Weston, is a greenfield site located in a sustainable location adjoining the key service village of Weston. It has been demonstrated that the site is available, suitable and deliverable within five years.

Land South-West of A51

- 4.21 The site comprises approximately 13.9 hectares of land to the south of Green Road, Weston. The site is currently in agricultural use, accessed via an existing access off Salt Works Lane to the west of the site. The site is bounded by residential development to the north, east and west. It is submitted that the site can accommodate 100-150 dwellings together with public open space.
- 4.22 The site is identified as Grade 3 quality agricultural land on the Provisional ALC map, however these maps aren't suitable for establishing the quality of individual sites. Further survey work can be undertaken as necessary in due course.

4.23 The site is located in Flood Zone 1, the area at least risk from flooding. The site is also flat and not constrained topographically. The site is not located within the Green Belt. There are no other known environmental constraints which would preclude the development of the site.

4.24 There are no heritage assets on or in the immediate vicinity of the site. The nearest heritage asset is a Grade II listed building known as 'Abbeylands', located approximately 400m north-west of the site.

Sustainability

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

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

4.27 In terms of public transport, a number of bus services run along the A518 between Stafford, Longton and Rugeley. These services run approximately 5 times per day.

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

Development Constraints

4.29 The site is located in Flood Zone 1, the area at least risk from flooding, and there are no heritage assets located on or in the immediate vicinity to the site. The site is not constrained topographically and there are no other constraints which might preclude development.

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

Demonstrating Deliverability

4.31 Footnote 11 to Paragraph 47 of the NPPF states that in order to be considered deliverable, sites should be available now, offer a suitable location for

development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. The paragraphs below demonstrate how the site is suitable, available and achievable to accommodate residential development.

Availability:

- 4.32 Through the continued promotion of this site, the landowner has demonstrated that they are supportive of the development of the site to deliver much needed new homes.
- 4.33 As such, this submission confirms that there is nothing to prevent this site from being delivered immediately.
- 4.34 The site can therefore be considered to be available.

Suitability:

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

Achievability:

- 4.36 It has been demonstrated that there are no constraints which would preclude the development of the site.
- 4.37 In terms of access, an existing access exists off Salt Works Lane, whilst there is the opportunity to provide an additional access off Green Road in combination with Richborough's smaller parcel referenced above.
- 4.38 The site is therefore not subject to any major physical constraints which would prevent development from being achieved.

Summary

- 4.39 To conclude, Land South-West of A51, South of Green Road, Weston, is a greenfield site located in a sustainable location adjacent to the key service village

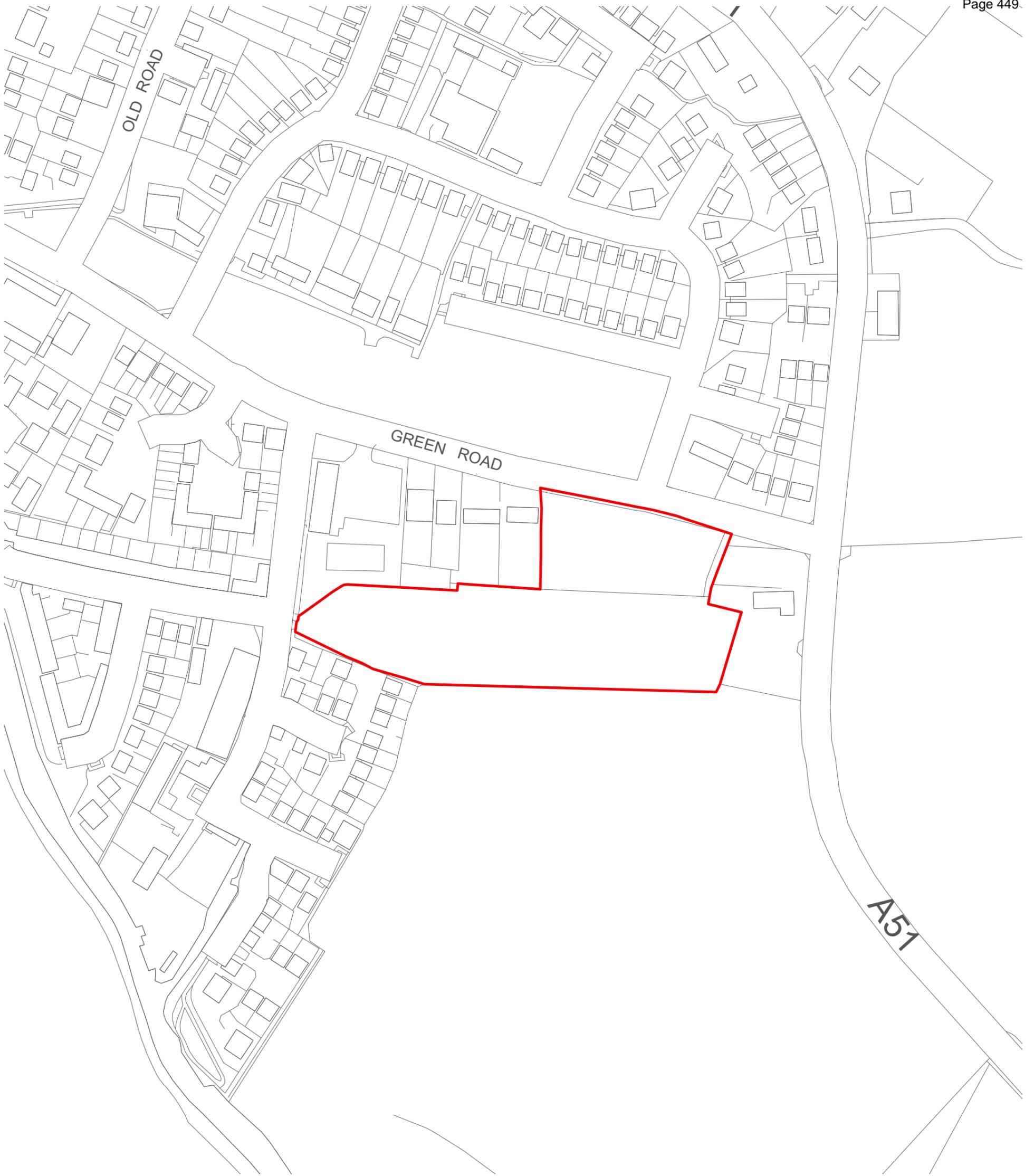
of Weston. It has been demonstrated that the site is available, suitable and deliverable within five years.

5. CONCLUSION

- 5.1 Richborough Estates is promoting Land South of Green Road, Weston, and Land South-West of the A51, Weston, for residential development. Both sites are sustainably located adjacent to the existing settlement boundary of the Key Service Village of Weston. Both sites are available and deliverable.
- 5.2 Richborough Estates welcomes the opportunity to comment at this early stage in the new Local Plan. If the Council requires any further information in respect of the sites to assist in the accurate assessments of either ,this can be provided upon request.

APPENDIX 1

SITE LOCATION PLAN; SOUTH OF GREEN ROAD



KEY

 Site boundary
(1.55 Ha)



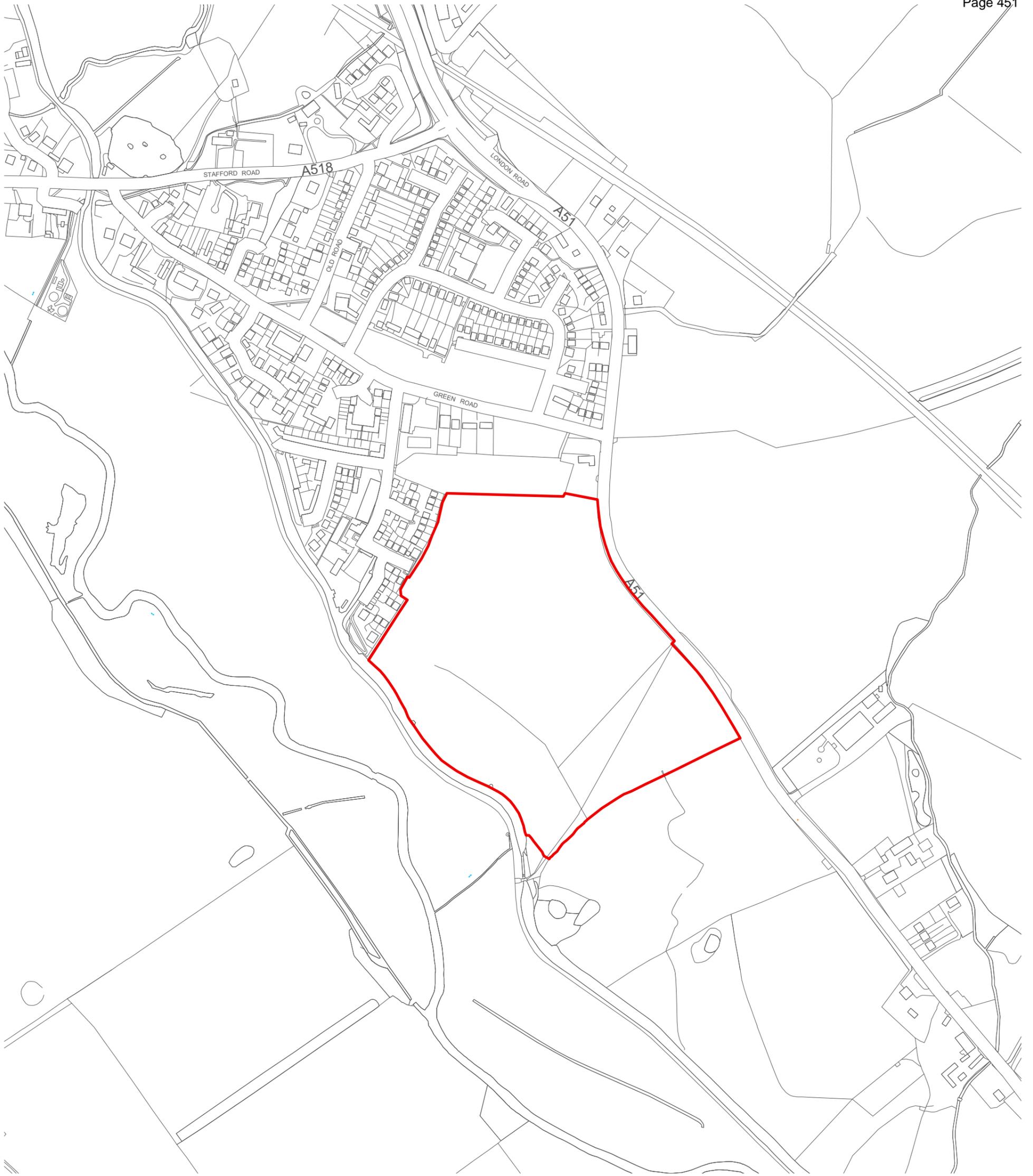
Green Road, Weston
Site Location Plan
South of Green Road

Drawing Ref: P16-1009_01
 Client: RICHBOROUGH ESTATES LTD
 Date : 02/01/2018
 Drawn by : JT
 Checked by : DRAFT
 Scale : 1 : 2000 @ A3



APPENDIX 2

SITE LOCATION PLAN; SOUTH-WEST OF A51



KEY

 Site boundary
(13.90 Ha)



Green Road, Weston
Site Location Plan
Land South-West of A51

Drawing Ref: P16-1009_02
 Client: RICHBOROUGH ESTATES LTD
 Date : 02/01/2018
 Drawn by : JT
 Checked by : DRAFT
 Scale : 1 : 5000 @ A3



From: Ben Cook [REDACTED]
Sent: 18 September 2018 11:29
To: forwardplanningconsultations
Subject: New Local Plan: Scoping the Issues - Consultation - Uttoxeter Road, Stone
Attachments: P18-1798_ScopingResponseForm_180918.pdf; P18-1798_LPR_FINAL_RevA_180918_combined.pdf

Dear Sir/Madam,

Please find attached a representation on behalf of Richborough Estates in respect of the New Local Plan: Scoping the Issues – Consultation. The representation includes the promotion of Land at Uttoxeter, Stone, for residential development. To this end, the representation includes a site location plan and illustrative masterplan as appendices.

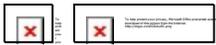
I trust the above and attached is clear and satisfactory, however, should you require anything else, please do not hesitate to contact me.

Kind regards,

Ben Cook
Senior Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

[REDACTED]



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Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Neil"/>
Last Name	<input type="text"/>	<input type="text" value="Cox"/>
Job Title (if applicable)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (if applicable)	<input type="text" value="Richborough Estates"/>	<input type="text" value="Pegasus Group"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
Address Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 3	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 4	<input type="text"/>	<input type="text" value="REDACTED"/>
Postcode	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail address	<input type="text"/>	<input type="text" value="REDACTED"/>

Name or Organisation	Neil Cox, Pegasus Group, on behalf of Richborough Estates
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Part B – Please use a separate sheet for each representation

Name or Organisation	Neil Cox, Pegasus Group, on behalf of Richborough Estates
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Question 1

What would you like the Borough to be like in the future?

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

Please see accompanying representation

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

Question 4

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

Please see accompanying representation

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

Please see accompanying representation

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

Please see accompanying representation

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

Please see accompanying representation

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Please see accompanying representation

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

Please see accompanying representation

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

Please see accompanying representation

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

Please see accompanying representation

Scoping The Issues Report: Response Form

Question 22

Any there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

Question 23

What economic development opportunities do you consider could arise from HS2 for the Borough?

Please see accompanying representation

Question 26

What could the Plan do to protect and enhance the Borough's Heritage Assets?

Please see accompanying representation

Question 27

What approach should the Local Plan take to ensure that Borough's landscape, Area of Outstanding Natural Beauty and its key features are protected and enhanced?

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

Please see accompanying representation

September 2018 | NCO/BC | P18-1798



STAFFORD BOROUGH NEW LOCAL PLAN

REGULATION 18 CONSULTATION (SCOPING THE ISSUES REPORT) JULY 2018

UTTOXETER ROAD, STONE

ON BEHALF OF RICHBOROUGH ESTATES



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

Pegasus Group



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APPENDICES:

APPENDIX 1: SITE LOCATION PLAN

APPENDIX 2: ILLUSTRATIVE MASTERPLAN

1. INTRODUCTION

- 1.1 These representations are made by Pegasus Group on behalf of Richborough Estates Limited to the Stafford Borough New Local Plan, Regulation 18 (Scoping the Issues Report) Consultation. This representation relates to land off Uttoxeter Road, Stone, which Richborough Estates is promoting for a residential development.
- 1.2 These representations respond to the following documents, including addressing the questions set out within the Local Plan Review Consultation Document:
- Stafford Borough Council New Local Plan Scoping the Issues Report, July 2018; and
 - Stafford Borough Council New Local Plan Settlement Assessment, July 2018
- 1.3 The representations are framed in the context of the requirements of the Local Plan to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2. SCOPING THE ISSUES REPORT

- 2.1 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 new Local Plan will guide where new development takes place across the Borough over the period 2020 – 2040. It is currently anticipated that the new Local Plan will be adopted in Autumn 2021.
- 2.2 Richborough Estates supports the proactive approach being taken by the Borough Council to ensure an up to date Plan is prepared so that growth is plan led. However, Richborough Estates raises concerns in respect of the identified Local Plan timetable, when contrasted with that of surrounding authority areas. It is considered that every effort should be made to expediate the new Local Plan, to bring the Plan Period forward into alignment with neighbouring authorities, due to the need to engage in cross-boundary strategic issues, as set out later within this representation.

Thinking Forward – Developing a Vision & Key Objectives

Question 2. What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

- 2.3 The new Local Plan should aspire to deliver housing and economic growth levels above the ‘minimum’ requirement identified through the standard method (as set out in national planning guidance). In doing so, the Local Plan will help to deliver sustainable growth outcomes, including supporting jobs and providing affordable housing. Furthermore, aspiring to deliver a greater level of growth will serve to support the needs of neighbouring authorities, as required by the Duty-to-Cooperate.

Key Policy Areas

Deciding Where Homes Should Go

Question 4. How could the new Local Plan support local villages and their communities to grow and thrive?

- 2.4 The adopted Local Plan for Stafford Borough seeks to deliver the majority of development at Stafford, Stone and the Key Service Villages. Other smaller

settlements in the Borough are not identified as delivering part of the housing requirement for the Borough. The new Local Plan for the Borough could support villages by attributing proportionate levels of housing growth to the settlements identified as being most sustainable, outside of the Key Service Villages. By planning positively for proportionate growth, the Council will allow local villages and communities to thrive economically, socially and environmentally, whilst avoiding less desirable, un-planned growth.

Making effective use of land

Question 5. Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

2.5 Richborough Estates supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised '*where there is an existing or anticipated shortage of land*'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range across an entire local authority area. Richborough Estates would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character.

2.6 Regarding the application of such standards, Richborough Estates considers that any standard should be set within a Local Plan Policy rather than in a Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.

Prioritising Brownfield Land

Question 6. National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

- 2.7 If the housing and employment needs of the Borough cannot be met on brownfield land, then the Council should look to suitable greenfield sites in sustainable locations which could be brought forward for development.

Deciding What Types of Homes to Build

Question 7. National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

- 2.8 The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met need arising from neighbouring authorities. Richborough Estates submits that, whilst it is important to identify a wide range of sites for housing, larger sites of around 50 or more dwellings provide the greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure.
- 2.9 Richborough Estates also submits that a specific housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead, Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the Plan Period. This ensures that housing mix is reflective of market-driven need.

Question 8. The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

- 2.10 Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. Authorities are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.
- 2.11 Given that authorities are required to maintain a register of demand for self-build housing, it would be inappropriate to include a blanket percentage within a Local Plan policy, particularly when the demand for self-build housing is susceptible to fluctuation through market demand. At any point during the plan period, it is

feasible that demand for self-build housing could fall, either in line with market conditions, or due to provision of a sufficient number of plots elsewhere within the Borough. In such a scenario, with a blanket percentage in force, further housing sites would come forward with self-build plots which have no realistic prospect of being developed. This approach would not, therefore, achieve the most efficient use of land, as required by the NPPF, to the detriment of the Borough's overall housing requirement.

- 2.12 Instead, it would be appropriate to secure self-build plots directly in line with demand. Policy should therefore be flexible and direct the reader to the most up-to-date evidence in respect of the demand for self-build plots, as per the requirements in respect of market and affordable housing mix.

Job Creation

Question 11. Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

- 2.13 Richborough Estates submits that identifying additional employment land to be delivered during the plan period is vital for supporting economic growth within the Borough, as well as to support the identified housing need arising both from within the Borough and from within neighbouring authorities. The Local Authority should utilise its evidence based to ascertain the amount and type of employment land required throughout the plan period.

Pollution and Air Quality

Question 20. What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

The new Local Plan should identify and deliver the most sustainable pattern of growth across the plan period. Significant development should be focused on locations which are, or can be made sustainable. Clearly, there are sustainability advantages from directing development to locations such as Stafford and Stone but the NPPF also recognises the need to promote sustainable development in more rural areas, and that new housing should be located where it will enhance or maintain the vitality of rural communities. Consequently, there is also a role for villages in the delivery of new housing.

Sustainable Transport Choices

Question 21. There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

- 2.14 See response to Question 20.

Question 23. What economic development opportunities do you consider could arise from HS2 for the Borough?

- 2.15 HS2 represents a significant opportunity for promoting growth within the Borough, particularly at Stafford Town, which is identified as benefitting from a planned station stop, and Stone where there are proposals for a new maintenance depot. The new Local Plan should take this into account when considering the spatial distribution of residential and employment growth.

- 2.16 HS2 also has implications for Stafford Borough in respect of the level and amount of growth to be planned for in the new Local Plan. The standard method for calculating housing need introduced by the Government is based on demographic forecasts and does not take economic growth into consideration. It is widely acknowledged that HS2 is likely to result in economic growth and Stafford Borough Council should accordingly consider planning for growth above the minimum level identified by the methodology.

High quality Design

Question 25. National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

- 2.17 The new Local Plan should establish design principles but should not be prescriptive so as to stifle innovative design or flexibility, in accordance with Paragraph 127 of the NPPF.

The Green Belt

Question 29. The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than

a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

2.18 Whist less than a quarter of the Borough area may be identified as falling within the Green Belt, the Scoping the Issues Report correctly identifies a number of other European and World level constraints that exist within the Borough, including:

- Cannock Chase Special Area of Conservation (SAC)
- Chartley Moss SAC (under the West Midlands Meres and Mosses SAC)
- Pasturefields Salt Marsh SAC
- Cop Mere (under Midland Meres and Mosses Phase II Ramsar designation)
- Aqualate Mere (under Midland Meres and Mosses Phase II Ramsar designation)
- Mottey Meadows SAC (on the edge of the Borough)

2.19 There are therefore clearly a number of other constraints to development within the Borough, other than the Green Belt. Furthermore, the above constraints are statutory (legal) designations, in contrast to Green Belt, which is a 'policy-on' designation. As such, these designations benefit from a higher level of protection than the Green Belt.

2.20 As such, should it transpire that insufficient suitable sites are identified as being available for development in sustainable locations, it may be necessary to turn to sustainable locations within the Green Belt in order to meet any outstanding housing or employment need. It would therefore be prudent for the Local Authority to have an up to date evidence base in respect of the Green Belt, to allow the Authority to make the most appropriate decision regarding the spatial strategy, regardless of whether or not it is determined that exceptional circumstances exist to justify the release of Green Belt land.

3. SETTLEMENT ASSESSMENT

- 3.1 Stafford Borough Council has published a Settlement Assessment document which seeks to establish a methodology in order to determine the settlement hierarchy to be included within the new Local Plan.
- 3.2 The Assessment considered the settlements within the Borough in terms of availability of services and facilities and level of public transport provision. This is based primarily on an analysis of the number of dwellings, services and facilities in the settlement. Therefore, this study presents the analysis and evidence, with recommendations, to underpin the Settlement Hierarchy which is to be included in a policy of the new Local Plan and considered at the Issues and Option Stage.
- 3.3 The methodology for identifying a settlement hierarchy for Stafford Borough is as follows:
- 1) Identify all potential settlements in the Borough - this includes those villages identified Stafford Borough Local Plan 2001, additional villages identified by Parish Councils, and those settlements in the north of the Borough which form part of the North Staffordshire Urban Areas.
 - 2) Identify the criteria to be used in allocating each settlement into one of the categories.
 - 3) Categorise the settlements into a hierarchy.
 - 4) Apply the criteria to each settlement using published data and other relevant sources of information, including where provided, the Parish Council survey.
- 3.4 The criteria used to assess each settlement as per point 4 above are as follows:
- a) Population (by ward).
 - b) Number of dwellings (by OS plans).
 - c) Relationship with the highway network.
 - d) Access to employment opportunities up to 3km.
 - e) Access to key facilities.
 - f) Accessibility.

- g) Education.
- h) Reliance on the car.
- i) Technological Challenges and Opportunities.

3.5 Richborough Estates is generally supportive of the above approach. However, it is considered that several amendments should be made to consolidate the assessment.

3.6 Firstly, in respect of population and number of dwellings in each settlement, the Assessment incorrectly states that "*the Census 2011 is only ward based, it does not breakdown into parishes and in many instances, it includes one or more settlements. Therefore, it only provides specific data for the towns of Stafford and Stone.*" Population and dwelling house data is in fact available at the Parish level through Nomis¹ or, in instances where an area is not Parished, data is available by utilising super output areas.

3.7 It is therefore considered that the assessment should be revisited to consider population and dwelling house figures utilising census data. This is especially the case regarding the of number of dwelling houses per settlement, as this information is likely to be more accurate than counting from an OS map, which would not accurately depict the precise number of dwellings in an apartment block, for example.

3.8 It is also considered that the criteria of '*relationship with the highway network*' and '*reliance on the car*' can be amalgamated with '*accessibility*', as they are effectively ways of measuring accessibility. Indeed, in the individual settlement assessment profiles included at Appendix B, these matters are all considered under a single '*accessibility*' heading.

3.9 Similarly, it is considered that '*education*' can be amalgamated with '*access to key facilities*'. Again, later in the document, schools are included within the list of key facilities against which settlements are assessed.

3.10 The Assessment then goes on to propose that settlements are identified as falling within a 7-tier hierarchy as follows:

¹ www.nomisweb.co.uk

Tier	Settlement Category	Description
1	Stafford	Largest urban area with a regionally significant service centre role providing employment, retail and other facilities, and a key role in driving growth.
2	Stone	Large town providing employment, retail and other facilities for a wide area
3	North Staffordshire Urban Areas	These areas are located in the north of the Borough and include Trentham Gardens, Clayton, Meir Heath/Rough Close and Blythe Bridge.
4	Large Villages	Large villages of 500 or more dwellings which act as key service centres for the surrounding rural area by virtue of the range of services and facilities they possess
5	Medium Villages	Villages of 250 or more dwellings which tend to have a lesser provision of services than larger villages that share services with nearby villages
6	Small Villages	Small villages with a definable village nucleus (i.e. not dispersed or ribbon development) of 50 or more dwellings with fewer services available.
7	Rest of the Borough	Development elsewhere (i.e. in an area not falling into one of the above categories). 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'.

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 wide area.
3	North Staffordshire Urban Areas	These areas are located in the north of the Borough and include Trentham Gardens; Clayton; Meir Heath/Rough Close; and Blythe Bridge.
4	Large Villages (500+ Houses)	Barlaston, Eccleshall, Gnosall, Great Haywood, Hixon, Little Haywood and Colwich, Yarnfield
5	Medium Villages (250+ Houses)	Barlaston Park, Brocton, Brocton A34, Derrington, Fulford, Great Bridgeford, Haughton, Tittensor, Weston, Woodseaves
6	Small Villages (50+ Houses)	Adbaston, Aston-by-Stone, Bradley, Church Eaton, Cold Meece, Cotes Heath, Creswell, Croxton, Gayton, Hilderstone, Hopton, Hyde Lea, Ingestre, Milford, Milwich, Moreton, Norbury, Norton Bridge, Oulton, Ranton, Salt, Seighford, Stallington, Swynnerton.

-
- 3.11 Richborough Estates submits that this settlement hierarchy should be revisited, as there is little justification to explain as to how the threshold for each tier/category has been determined. For example Weston has slipped from being a Key Service Village (a village which the current Development Plan notes as having a primary school, local retailing, some healthcare provision and good links to Hixon's industrial estates) to a 5th tier settlement.
- 3.12 Furthermore, it appears that the threshold for each tier is based solely on the number of dwellings that currently exist within each settlement. This does not take into consideration the assessment criteria as set out earlier within the Assessment and is a poor indicator of the overall sustainability level of each settlement. For example, a settlement may have a relatively low number of dwellings, but benefit from a higher level of employment opportunities, services, facilities and public transport opportunities. Such a settlement would therefore be a sustainable location for development but would instead sit near the foot of the above hierarchy. Conversely, a larger settlement in terms of dwelling numbers may not benefit from as many employment opportunities, services, facilities and public transport opportunities and would therefore be a less sustainable location for development.
- 3.13 It is therefore submitted that the Council should revisit the Settlement Profiles Contained within Appendix B of the Assessment and should seek to attribute a score to each settlement, based upon the assessment criteria identified above. The Settlements can then be justifiably attributed to a specific tier in the hierarchy, based upon the sustainability of each settlement.

4. LAND AT UTTOXETER ROAD, STONE

- 4.1 Richborough Estates is promoting Land at Uttoxeter Road, Stone for residential development. It is anticipated that the site can accommodate approximately 85 dwellings. A Site Location Plan and Illustrative Masterplan are included at Appendix 1 and Appendix 2 to this representation.

APPENDIX 1 – SITE LOCATION PLAN

APPENDIX 2 – ILLUSTRATIVE MASTERPLAN

The Site

- 4.2 The Site comprises approximately 4.56ha of land adjoining the south-eastern edge of Stone, Staffordshire, which is currently used for agricultural purposes.
- 4.3 The site is bounded to the north by existing residential development and Uttoxeter Road (B5027); to the east by a track which provides access to Little Stoke Farm, and beyond by the Little Stoke Cricket Club and undeveloped agricultural land; to the south by undeveloped agricultural land; and to the west by the West Coast Mainline and beyond by existing residential development.
- 4.4 The site is located entirely within Flood Zone 1 (land having less than 1 in 1,000 annual probability of river or sea flooding). The site is not subject to any nationally significant landscape, heritage, ecological or other designations (such as National Park, Scheduled Ancient Monuments, SSSI's or World Heritage Site). Furthermore, the site does not have any local environmental or other designations and it is not located in an area of Green Belt.
- 4.5 The site comprises a mix of Grade 5 and Grade 3b agricultural land and is therefore does not comprise best and most versatile agricultural land.
- 4.6 The site has previously been the subject of two planning applications for residential development (ref: 14/21316/OUT and ref: 16/24533/OUT). However, these applications were both refused due the site being located beyond the settlement boundary in an instance when the Council was able to demonstrate a five-year supply of housing sites. Neither application was subject to a refusal due to a technical matter or due to the site being inappropriate for residential development.

The Surrounding Area

- 4.7 The surrounding area is predominantly residential in character, with the built-up area comprised of housing, services and employment areas. The Site is not located in close proximity to any Conservation Areas or areas of landscape or other sensitivity. A listed building is located approximately 200m to the west of the site access, immediately adjacent to the level crossing on Uttoxeter Road, but it is not visible from the site.
- 4.8 The Site is in close proximity to a range of shops, services and employment areas. In particular, the site is approximately 2km from Stone town centre, which provides a range of shops and services, including food stores, post offices and other day-to-day facilities. The site is also located approximately 1.6km from Stone Business Park which includes a range of industrial and commercial businesses.

Sustainable Travel

- 4.9 There are a range of local facilities near to the site. These include, but are not limited to (distances are approximate from centre of the site):
- Little Stoke Cricket Club and Bowling Green - 100m
 - Smartys pre-school nursery - 300m
 - Three Crowns Public House - 350m
 - Fairway Service Station (convenience store/newsagent, car garage and petrol station) - 350m
 - St. Michael's Church of England First School - 1,000m
 - Aston Marina Farm Shop and Bistro - 1,100m
 - Stone Cricket Club - 1,400m
 - Mansion House Health Surgery - 1,850m
- 4.10 The site benefits from genuine opportunities to utilise sustainable transport modes such as bus and train services, which are available within the centre of Stone. In particular, Stone Railway Station benefits from hourly services between Crew and London Euston, via Stafford.

Access

- 4.11 Initial highways consideration confirms that a safe and suitable access can be provided to the site via T-junction from Uttoxeter Road. The identified site access is able to achieve 2.4 x 59m visibility splays in either direction, in accordance with Manual for Streets.

Landscape

- 4.12 Richborough Estates has instructed both desktop and fieldwork analysis in respect of the site, which has determined that the site, and its immediate context, contains features representative of the 'Settled Farmlands' LCT; however, it does not contain any particularly notable, rare or unique features. This is important to understand when considering the potential impacts of the proposed development in the context. The submitted illustrative masterplan included at **Appendix 2** to this Representation has also utilised the key characteristics of the LCT to inform the design and site proposals have addressed important landscape objectives and recommendations highlighted in the relevant SPG.
- 4.13 Available views towards the site and the existing visual experience are greatly influenced by the wider undulating topography, on site vegetation, surrounding woodland belts and the established settlement of Stone, situated to the north and west of the site. Clearer views are mainly confined to the site's immediate surroundings and middle ground to the east; although, the site is only ever seen in part from these locations. Distant views are mostly filtered by prominent intervening vegetation or partially restricted by existing built form.
- 4.14 Overall, it has been assessed that character effects are localised and that visual effects are largely limited to the site and its immediate surroundings. The majority of the relevant landscape policy objectives and SPD/SPG criteria are satisfied through an appropriate development response that responds to the site-specific criteria and established landscape strategy.

Flood Risk and Drainage

- 4.15 Based on the Environment Agency's Flood Map for planning, the site is shown to be located within Flood Zone 1; land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%), and therefore is suitable for residential development.

4.16 The site is capable of being development in such a way so as to not increase the risk of flooding associated with surface water run-off. Any development would incorporate SUDS in accordance with Local Plan Policy N2 and include an additional 30% allowance to accommodate the effects of climate change.

Indicative Proposal

4.17 To accompany these representations, an indicative masterplan has been prepared, including at **Appendix 2**. This has been prepared having regard to existing constraints, as well as relevant planning policy and guidance.

4.18 The indicative masterplan identifies the following key features:

- Delivery of approximately 85 dwellings, provided at a gross density of 18.6 dwellings per hectare (31 dwellings per hectare net);
- Access from Uttoxeter Road;
- 0.52 Ha of formal public open space, with an additional 1.28 Ha of general green space or green infrastructure, including retaining existing vegetation wherever possible; and
- Attenuation ponds to western edge of site.

4.19 The general layout of the indicative masterplan can be divided into three approximately areas: the residential parcel directly off the access from Uttoxeter Road, and two separate parcels of residential development separated from the first by a linear green corridor. These in turn are separated from each other by an existing watercourse and hedge. This layout ensures the most efficient use of the site area, retaining natural features of value, without compromising the visual amenity of the wider area when viewed from the surrounding countryside.

4.20 The layout and block structure have been designed not only to complete the south-eastern settlement edge of Stone, but to also create a positive relationship with the open countryside beyond. Blocks have been orientated to create a soft edge to the development. Creating a positive interface between the proposed development and the surrounding countryside.

4.21 The layout of the development has been based around a perimeter block structure. Residential blocks and frontages respond to adjacent street hierarchies to provide

a permeable and legible form of development. All block dimensions have been designed to allow for flexibility with regard to housing types and parking arrangements whilst adhering to good design principles. Parking is provided through a range of different arrangements, either on plot, or in garages or on street. These vary according to street character.

- 4.22 Areas of formal and informal public open space run throughout the proposals. The linear green corridor running diagonally across the site provides an opportunity for informal open space. This will allow for considerable levels of habitat and buffer planting to help support local wildlife and reduce the visual impact of the proposed development. Areas of formal public open space are scattered across the development, designed to be accessible to all. These are located centrally, and to the east and south of the residential areas.
- 4.23 There is a large open space buffer to the western edge of the site, designed to protect the new residential community from any adverse noise of the railway line. This area of open space also provides an opportunity for sustainable urban drainage systems to be located at the lowest part of the site, to naturally drain the proposed development.

Suitability

- 4.24 The indicative masterplan demonstrates how a scheme for approximately 85 dwellings can be achieved having regard to development design guidelines and development standards currently utilised by the Council. The proposal is sustainable and represents a logical extension to the settlement of Stone.

Deliverability

- 4.25 Detailed technical work prepared in support of the previous planning applications on this site have demonstrated that there are no technical constraints to prevent its deliverability.
- 4.26 Further technical work can be commissioned to further demonstrate the deliverability of this site. However, initial technical work in relation to the key disciplines undertaken to date confirms there are no constraints likely to render the site undeliverable in the Plan period. The site is available now.

- 4.27 There are no existing uses that would require relocation and no issues of contamination that would require remediation.
- 4.28 The site is deliverable and immediately available and, subject to allocation, could deliver homes and associated community benefits within the next 5 years.

5. CONCLUSION

- 5.1 Richborough Estates is promoting Land at Uttoxeter Road, Stone, for residential development. The site is sustainably located adjacent to the existing urban area of Stone, which is identified as the second most sustainable settlement in the Borough, after Stafford, in the adopted Local Plan. This site is available and deliverable.
- 5.2 An Illustrative Masterplan is appended to this Representation which demonstrates how the site might come forward for development. Furthermore, the planning history of the site indicates that there are no technical reasons why the site is not suitable for development.
- 5.3 Richborough Estates welcomes the opportunity to comment at this early stage in the new Local Plan. If the Council requires any further information in respect of the site to assist in the accurate assessment of the site, this can be provided upon request.

APPENDIX 1

SITE LOCATION PLAN



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Application Site Boundary

Client:
Richborough Estates

Project:
Land at Uttoxeter Road, Stone

Drawing:
Site Location Plan

Scale:
1:1,250 (A3)

Status:
Planning

Project Number:
RICM2001

Drawing Number:
1000

Date:
27/10/14

Revision:
03



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APPENDIX 2

ILLUSTRATIVE MASTERPLAN



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- Site boundary
- 1 Proposed Vehicular Access
- 2 Proposed Pedestrian Access
- 3 Primary Street
- 4 Secondary Street
- 5 Shared Lane/Driveway
- 6 Existing Trees
- 7 Enhance Boundary Planting and 1.75m Livestock Fence
- 8 New/Enhanced Habitat Planting
- 9 Public open space
- 10 Attenuation Pond
- 11 Diverted watercourse

Client:
Richborough Estates

Project:
Uttoxeter Road, Stone

Drawing:
Illustrative Masterplan

Scale: **1:1,250 (A3)** Status: **Draft**

Project Number:
RICM2001

Drawing Number:
3000

Date: **27/10/2014** Revision: **05**

Promap

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From: Ben Cook [REDACTED]
Sent: 18 September 2018 11:31
To: forwardplanningconsultations
Subject: New Local Plan: Scoping the Issues - Consultation - The Crescent, Stafford
Attachments: P18-1821_LPR_FINAL_180918_combined.pdf; P18-1821_ScopingResponseForm_180918.pdf

Dear Sir/Madam,

Please find attached a representation on behalf of Lovell Partnerships in respect of the New Local Plan: Scoping the Issues – Consultation. The representation includes the promotion of Land at The Crescent, Stafford, for residential development. To this end, the representation includes a site location plan and illustrative masterplan as appendices.

I trust the above and attached is clear and satisfactory, however, should you require anything else, please do not hesitate to contact me.

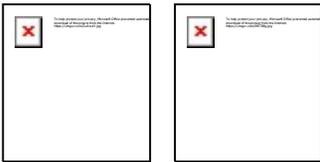
Kind regards,

Ben Cook
Senior Planner

Pegasus Group
PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

[REDACTED]

  [REDACTED]
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Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Neil"/>
Last Name	<input type="text"/>	<input type="text" value="Cox"/>
Job Title (if applicable)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (if applicable)	<input type="text" value="Lovell Partnerships"/>	<input type="text" value="Pegasus Group"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="REDACTED"/>
Address Line 2	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 3	<input type="text"/>	<input type="text" value="REDACTED"/>
Address Line 4	<input type="text"/>	<input type="text" value="REDACTED"/>
Postcode	<input type="text"/>	<input type="text" value="REDACTED"/>
Telephone Number	<input type="text"/>	<input type="text" value="REDACTED"/>
E-mail address	<input type="text"/>	<input type="text" value="REDACTED"/>

Name or Organisation	<input type="text" value="Neil Cox, Pegasus Group, on behalf of Lovell Partnerships"/>
----------------------	--

Part B – Please use a separate sheet for each representation**Name or Organisation**

Neil Cox, Pegasus Group, on behalf of Lovell Partnerships

Question 1

What would you like the Borough to be like in the future?

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

Please see accompanying representation

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

Please see accompanying representation

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

Please see accompanying representation

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

Please see accompanying representation

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

Please see accompanying representation

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

Please see accompanying representation

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

Please see accompanying representation

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

Please see accompanying representation

Question 22

Any there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.

Question 23

What economic development opportunities do you consider could arise from HS2 for the Borough?

Please see accompanying representation

Question 24

Are there any specific transportation projects that the Council should be promoted in the Local Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.

Question 25

National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally.

Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

Please see accompanying representation

September 2018 | NCO/BC | P18-1821



STAFFORD BOROUGH NEW LOCAL PLAN

REGULATION 18 CONSULTATION (SCOPING THE ISSUES REPORT) JULY 2018

THE CRESCENT, STAFFORD

ON BEHALF OF LOVELL PARTNERSHIPS LTD

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

Pegasus Group

[Redacted text block]

[Redacted text block]

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	SCOPING THE ISSUES REPORT	2
3.	SETTLEMENT ASSESSMENT	7
4.	LAND NORTH OF THE CRESCENT, STAFFORD	10
5.	CONCLUSION	13

APPENDICES:

APPENDIX 1: SITE LOCATION PLAN

APPENDIX 2: FEASIBILITY LAYOUT PLAN

1. INTRODUCTION

1.1 These representations are made by Pegasus Group on behalf of Lovell Partnerships Ltd to the Stafford Borough New Local Plan, Regulation 18 (Scoping the Issues Report) Consultation. This representation relates to Land North of The Crescent, Stafford, which Lovell Partnerships is promoting for a residential development.

1.2 These representations respond to the following documents, including addressing the questions set out within the Local Plan Review Consultation Document:

- Stafford Borough Council New Local Plan Scoping the Issues Report, July 2018; and
- Stafford Borough Council New Local Plan Settlement Assessment, July 2018

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

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

2. SCOPING THE ISSUES REPORT

- 2.1 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 new Local Plan will guide where new development takes place across the Borough over the period 2020 – 2040. It is currently anticipated that the new Local Plan will be adopted in Autumn 2021.
- 2.2 Lovell Partnerships supports the proactive approach being taken by the Borough Council to ensure an up to date Plan is prepared and to ensure that growth is planned. However, Lovell Partnerships raises concerns in respect of the identified Local Plan timetable, when contrasted with that of surrounding authority areas. It is considered that every effort should be made to expediate the new Local Plan, to bring the Plan Period forward into alignment with neighbouring authorities, due to the need to engage in cross-boundary strategic issues, as set out later within this representation.

Thinking Forward – Developing a Vision & Key Objectives

Question 2. What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

- 2.3 The new Local Plan should aspire to deliver housing and economic growth levels above the 'minimum' requirement identified through the standard method (as set out in national planning guidance). In doing so, the Local Plan will help to deliver sustainable growth outcomes, including supporting jobs and providing affordable housing. Furthermore, aspiring to deliver a greater level of growth will serve to support the needs of neighbouring authorities, as required by the Duty-to-Cooperate.

Key Policy Areas

Making effective use of land

Question 5. Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

- 2.4 Lovell Partnerships supports the efficient use of land, in accordance with National Planning Policy and Guidance. The setting of any density standards in the new Local

Plan should only be undertaken in accordance with Paragraph 123 of the NPPF, which stipulates that such standards should be utilised 'where there is an existing or anticipated shortage of land'. Standards should be applied in suitable locations such as town centres and those benefiting from good public transport links. Paragraph 123 of the NPPF also indicates that it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range across an entire local authority area. Lovell Partnerships would endorse this approach. Any standard should also retain a degree of flexibility to allow for development to reflect local character.

- 2.5 Regarding the application of such standards, Lovell Partnerships considers that any standard should be set within a Local Plan Policy rather than in a Supplementary Planning Document (SPD). The inclusion of standards within the Local Plan not only provides certainty to developers upfront but would also be subject to viability testing and examination in public, thus ensuring that the standards are deliverable.

Prioritising Brownfield Land

Question 6. National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

- 2.6 If the housing and employment needs of the Borough cannot be met on brownfield land, then the Council should look to suitable greenfield sites in sustainable locations which could be brought forward for development.

Deciding What Types of Homes to Build

Question 7. National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

- 2.7 The new Local Plan should deliver housing to meet the full range of local needs, including affordable and specialist housing, in addition to un-met need arising from neighbouring authorities. Lovell Partnerships submits that, whilst it is important to identify a wide range of sites for housing, larger sites provide the

greatest level of opportunity to provide for a mix of housing in terms of size, type and tenure.

- 2.8 Lovell Partnerships also submits that a specific housing mix should not be specified in any Local Plan Policy, which only presents snapshot in time. Instead, Policy should direct the reader to the latest evidence base, such as the Strategic Housing Market Assessment (SHMA), which should be routinely updated across the Plan Period. This ensures that housing mix is reflective of market-driven need.

Question 8. The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

- 2.9 Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. Authorities are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand.
- 2.10 Given that authorities are required to maintain a register of demand for self-build housing, it would be inappropriate to include a blanket percentage within a Local Plan policy, particularly when the demand for self-build housing is susceptible to fluctuation through market demand. At any point during the plan period, it is feasible that demand for self-build housing could fall, either in line with market conditions, or due to provision of a sufficient number of plots elsewhere within the Borough. In such a scenario, with a blanket percentage in force, further housing sites would come forward with self-build plots which have no realistic prospect of being developed. This approach would not, therefore, achieve the most efficient use of land, as required by the NPPF, to the detriment of the Borough's overall housing requirement.
- 2.11 Instead, it would be appropriate to secure self-build plots directly in line with demand. Policy should therefore be flexible and direct the reader to the most up-to-date evidence in respect of the demand for self-build plots, as per the requirements in respect of market and affordable housing mix.

Job Creation

Question 11. Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

- 2.12 Lovell Partnerships submits that identifying additional employment land to be delivered during the plan period is vital for supporting economic growth within the Borough, as well as to support the identified housing need arising both from within the Borough and from within neighbouring authorities. The Local Authority should utilise its evidence based to ascertain the amount and type of employment land required throughout the plan period.

Pollution and Air Quality

Question 20. What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

The new Local Plan should identify and deliver the most sustainable pattern of growth across the plan period. Significant development should be focused on locations which are, or can be made sustainable, thus limiting the need to travel and thus reducing congestion and emissions, as well as improving air quality and public health.

Sustainable Transport Choices

Question 21. There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

- 2.13 See response to Question 20.

Question 23. What economic development opportunities do you consider could arise from HS2 for the Borough?

- 2.14 HS2 represents a significant opportunity for promoting growth within the Borough, particularly at Stafford Town, which is identified as benefitting from a planned station stop. The new Local Plan should take this into account when considering the spatial distribution of residential and employment growth, in particular, by considering the co-location of development in the proximity of the planned stop.

- 2.15 HS2 also has implications for Stafford Borough in respect of the level and amount of growth to be planned for in the new Local Plan. The standard method for calculating housing need introduced by the Government is based on demographic forecasts and does not take economic growth into consideration. It is widely acknowledged that HS2 is likely to result in economic growth and Stafford Borough Council should accordingly consider planning for growth above the minimum level identified by the methodology.

High quality Design

Question 25. National policy reinforces good design as a key aspect of sustainable development and provides support to ensure high standards of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?

- 2.16 The new Local Plan should establish design principles but should not be prescriptive so as to stifle innovative design or flexibility, in accordance with Paragraph 127 of the NPPF.

3. SETTLEMENT ASSESSMENT

3.1 Stafford Borough Council has published a Settlement Assessment document which seeks to establish a methodology in order to determine the settlement hierarchy to be included within the new Local Plan.

3.2 The Assessment considered the settlements within the Borough in terms of availability of services and facilities and level of public transport provision. This is based primarily on an analysis of the number of dwellings, services and facilities in the settlement. Therefore, this study presents the analysis and evidence, with recommendations, to underpin the Settlement Hierarchy which is to be included in a policy of the new Local Plan and considered at the Issues and Option Stage.

3.3 The methodology for identifying a settlement hierarchy for Stafford Borough is as follows:

- 1) Identify all potential settlements in the Borough - this includes those villages identified Stafford Borough Local Plan 2001, additional villages identified by Parish Councils, and those settlements in the north of the Borough which form part of the North Staffordshire Urban Areas.
- 2) Identify the criteria to be used in allocating each settlement into one of the categories.
- 3) Categorise the settlements into a hierarchy.
- 4) Apply the criteria to each settlement using published data and other relevant sources of information, including where provided, the Parish Council survey.

3.4 The criteria used to assess each settlement as per point 4 above are as follows:

- a) Population (by ward).
- b) Number of dwellings (by OS plans).
- c) Relationship with the highway network.
- d) Access to employment opportunities up to 3km.
- e) Access to key facilities.
- f) Accessibility.

- g) Education.
- h) Reliance on the car.
- i) Technological Challenges and Opportunities.

3.5 Lovell Partnerships Ltd is generally supportive of the above approach. However, it is considered that several amendments should be made to consolidate the assessment.

3.6 Firstly, in respect of population and number of dwellings in each settlement, the Assessment incorrectly states that *"the Census 2011 is only ward based, it does not breakdown into parishes and in many instances, it includes one or more settlements. Therefore, it only provides specific data for the towns of Stafford and Stone."* Population and dwelling house data is in fact available at the Parish level through Nomis¹ or, in instances where an area is not Parished, data is available by utilising super output areas.

3.7 It is therefore considered that the assessment should be revisited to consider population and dwelling house figures utilising census data. This is especially the case regarding the of number of dwelling houses per settlement, as this information is likely to be more accurate than counting from an OS map, which would not accurately depict the precise number of dwellings in an apartment block, for example.

3.8 It is also considered that the criteria of *'relationship with the highway network'* and *'reliance on the car'* can be amalgamated with *'accessibility'*, as they are effectively ways of measuring accessibility. Indeed, in the individual settlement assessment profiles included at Appendix B, these matters are all considered under a single *'accessibility'* heading.

3.9 Similarly, it is considered that *'education'* can be amalgamated with *'access to key facilities'*. Again, later in the document, schools are included within the list of key facilities against which settlements are assessed.

¹ www.nomisweb.co.uk

3.10 Overall, Lovell Partnerships is supportive of the continued recognition of Stafford as the most sustainable location within the Borough and its continued focus for development throughout the plan period.

4. LAND NORTH OF THE CRESCENT, STAFFORD

- 4.1 Lovell Partnerships is promoting Land North of The Crescent, Stafford, for residential development. It is anticipated that the site can accommodate approximately 110 dwellings. A Site Location Plan is included at **Appendix 1** to this representation, whilst a Feasibility Layout is included at **Appendix 2**.

APPENDIX 1 – SITE LOCATION PLAN

APPENDIX 2 – FEASIBILITY LAYOUT

The Site

- 4.2 The site comprises approximately 3 hectares of land to the north of The Crescent. The site comprises scrubland in no current use, accessed via an existing access gate off Chetney Close. The site is bounded by residential development to the south and a railway line to the north.
- 4.3 The majority of the site is located in Flood Zone 1, the area at least risk from flooding. However, a small element of the northern boundary of the site, adjacent to the railway line, falls within Flood Zones 2 and 3.
- 4.4 The site is flat and not constrained topographically. The site is not located within the Green Belt. The Doxey and Tillington Marshes Ste of Special Scientific Interest is located immediately adjacent to the northern and western boundaries of the site.
- 4.5 There are no other known environmental constraints which would preclude the development of the site.

Sustainability

- 4.6 The site is sustainably located immediately adjacent to the defined settlement limits of Doxey, which forms part of the contiguous urban area of Stafford. The site accordingly benefits from good access to a number of services and facilities and is therefore considered to be sustainable.

Development Constraints

- 4.7 The majority of the site is located in Flood Zone 1, the area at least risk from flooding. Development will be contained within this Flood Zone, with those areas of the site at greater risk of flooding remaining undeveloped. There are no heritage

assets located on or in the immediate vicinity to the site. The site is not constrained topographically and there are no other constraints which might preclude development.

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

Demonstrating Deliverability

- 4.9 Footnote 11 to Paragraph 47 of the NPPF states that in order to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. The paragraphs below demonstrate how the site is suitable, available and achievable to accommodate residential development.

Availability:

- 4.10 Through the submission of this site through the Call for Sites consultation, the landowner has demonstrated that they are supportive of the development of the site to deliver much needed new homes.
- 4.11 As such, this representation confirms that there is nothing to prevent this site from being delivered immediately.
- 4.12 The site can therefore be considered to be available.

Suitability:

- 4.13 The site is well located in terms of its functional relationship with Doxey. The site has also been demonstrated to be sustainable. The site would therefore be well placed to ensure that future residents would have access to a diverse range of services and facilities, representing an opportunity to deliver a cohesive, sustainable community that acts as a natural and logical extension to Stafford.

Achievability:

- 4.14 It has been demonstrated that there are no constraints which would preclude the development of the site.
- 4.15 In terms of access, an existing access exists off Chetney Close which could be easily adapted to accommodate residential traffic.

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

Summary

4.17 To conclude, Land North of The Crescent, Stafford, is a greenfield site located in a sustainable location adjacent to the contiguous urban area of Stafford. It has been demonstrated that the site is available, suitable and deliverable within five years.

5. CONCLUSION

- 5.1 Lovell Partnerships is promoting Land North of The Crescent, Doxey, Stafford, for residential development. The site is sustainably located adjacent to the existing urban area of Stafford, which is identified as the most sustainable settlement in the Borough, in the adopted Local Plan. This site is available and deliverable.
- 5.2 Lovell Partnerships welcomes the opportunity to comment at this early stage in the new Local Plan. If the Council requires any further information in respect of the site to assist in the accurate assessment of the site, this can be provided upon request.

APPENDIX 1

SITE LOCATION PLAN

Notes

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Revision Date By Chkd



Client

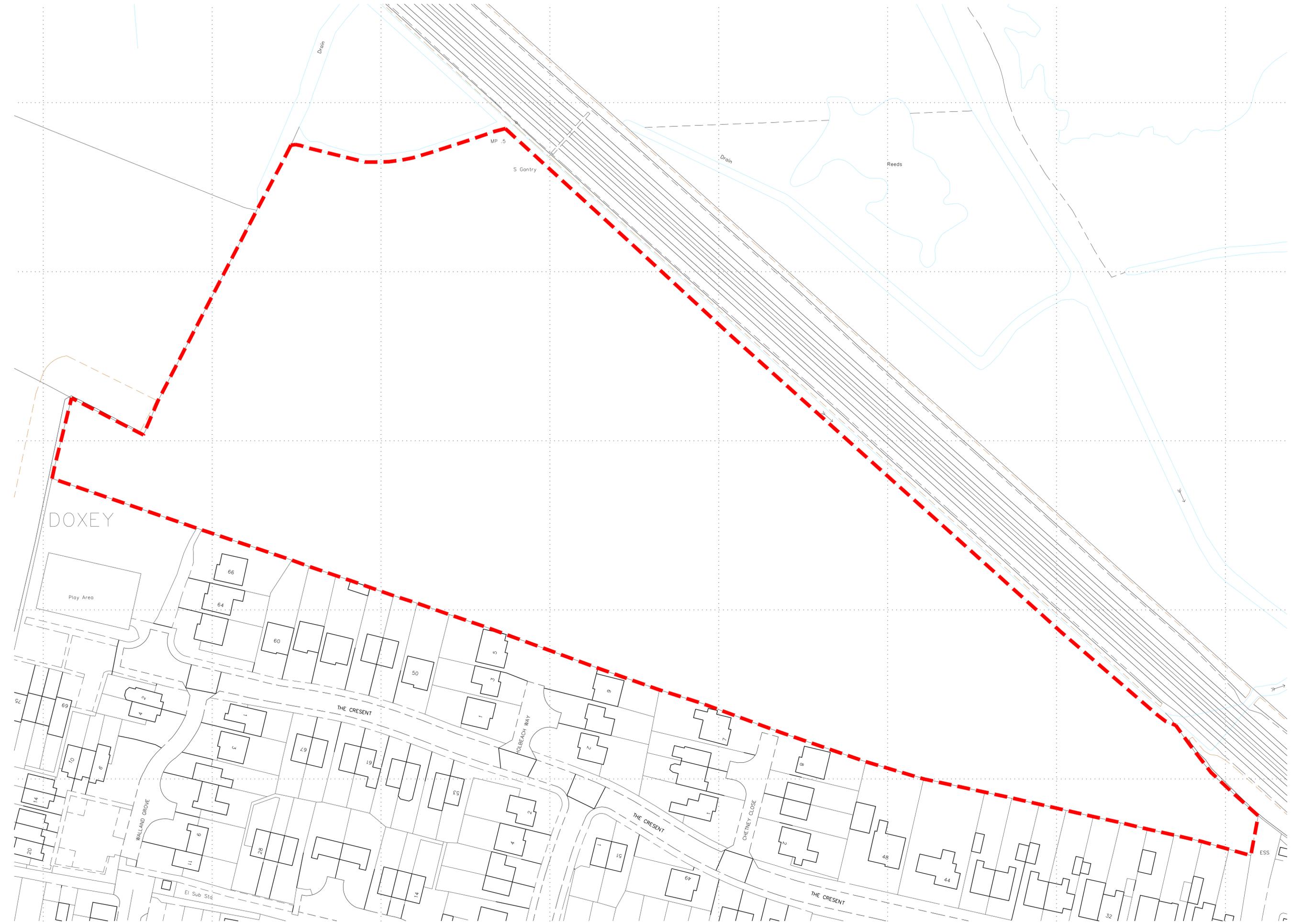
LOVELL

Project
 LAND TO REAR - DOXEY ROAD
 THE CRESENT
 STAFFORDSHIRE

CISB Element

Drawing
 LOCATION PLAN

Drawn by PJS	Checked DZ
Scale 1:500@A1	Dated JUNE 2017
Job No. 70300	Drawing No. D00
	Revision -



APPENDIX 2

FEASIBILITY LAYOUT PLAN



ACCOMMODATION SCHEDULE

AFFORDABLE			
DWELLING TYPE		GI FLOOR AREA	AMOUNT
B	2B4P HOUSE	680 sqft	15
C	3B5P HOUSE	912 sqft	02
D	3B5P HOUSE	914 sqft	26
L	4B6P HOUSE	1065 sqft	12
TOTAL			55

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

GRAND TOTAL 110

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A	99.99.99	ZZ	ZZ



FEASIBILITY

Client

LOVELL

Project
 LAND TO REAR - DOXEY ROAD
 THE CRESENT
 STAFFORDSHIRE

CiS/b: Element

Drawing
 FEASIBILITY SITE PLAN

Drawn by PJS	Checked DZ
Scale 1:500@A1	Dated JUNE 2017
Job No. 70300	Drawing No. D01
	Revision C



From: Nathan Conway [REDACTED]
Sent: 18 September 2018 11:40
To: forwardplanningconsultations
Subject: New Stafford Local Plan Consultations
Attachments: Local Plan Scoping the Issues Rep - Lord Stafford Estates.pdf; Settlement Assessment Rep - Lord Stafford Estates.pdf

Dear Sir / Madam

I am pleased to attach representations in response to the new Stafford Local Plan Scoping the Issues Report and Settlement Assessment consultations.

These representations are submitted on behalf of our client Lord Stafford Estates.

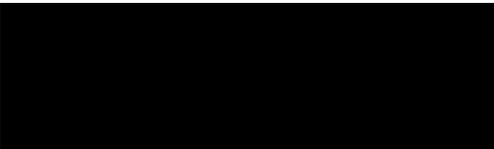
Should you have any difficulties in viewing these documents please do get in touch.

I would be grateful if you could please provide confirmation of receipt of these representations at your earliest convenience.

Kind regards,

Nathan

Nathan Conway BA (Hons) MTP MRTPI
Senior Planner
Planning



 Before printing, think about the environment



NOTICE: This email is intended for the named recipient only. It may contain privileged and confidential information. If

Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Lord Stafford Estates	Mr
First Name		Nathan
Last Name		Conway
Job Title (if applicable)		Senior Planner
Organisation (if applicable)		Savills
Address Line 1		██████████
Address Line 2		██████████
Address Line 3		
Address Line 4		
Postcode		██████
Telephone Number		██████████
E-mail address		████████████████████

Name or Organisation	Savills
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Part B – Please use a separate sheet for each representation

Name or Organisation	Savills
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Question 1

What would you like the Borough to be like in the future?

N/A

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

It should be recognised that the delivery of housing will have a positive impact on all of these challenges, including positive social, community and health outcomes. This can be achieved through developer contributions towards improvements to local services, along with the build-up of a critical mass of residents to enable and support the provision of new community and health facilities.

A key objective of the Local Plan should therefore be the delivery of housing growth to support the needs of the Borough and to maintain a balanced portfolio of housing sites in the most sustainable settlements. The Local Plan should recognise that developer contributions can fund improvements to that fulfil these outcomes and a critical mass of residents to ensure the viability of local services and delivery of appropriate and commensurate infrastructure to support growth.

The Local Plan should also recognise that sustainable housing growth in rural areas can enhance or maintain the viability of local communities. Sustainable development in rural areas is promoted in the revised NPPF (paragraph 78) and the Local Plan should be prepared in this context.

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

N/A

Question 4

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

It is considered appropriate for most development to be delivered through the Sustainable Settlement Hierarchy at Stafford, Stone and the Key Service Villages, such as Yarnfield. However, paragraph 3.8 of the Scoping Report states that other smaller settlements which are not categorised as Key Service Villages, are currently not considered appropriate for growth as they have fewer services and facilities. The Local Plan should not dismiss smaller settlements in principle as being inappropriate for growth. This represents conflict with paragraph 78 of the revised NPPF, which promotes the sustainable development of housing in rural areas where it will enhance or maintain the vitality of rural communities. Paragraph 78 also states that opportunities should be identified for villages to grow and thrive, especially where this will support local services. The Local Plan should recognise that smaller settlements often provide opportunities for sustainable growth and comprise existing facilities that would support growth. The Settlement Assessment identifies medium and small villages that comprise a number of existing services and facilities that can support growth, such as Swynnerton. Development can also improve the sustainability of villages and can provide the necessary contributions to fund new and improved community facilities and public services.

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

Each location (site and settlement) should be considered on its own merits, and subject to existing constraints, opportunities, character and proximity to public transport. All of these factors will provide varied influences on the density of development that is appropriate in each location.

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

The Council should focus on providing new development opportunities in the most sustainable settlements with an appropriate range of services, facilities and access to employment opportunities.

The Settlement Assessment is a useful tool in identifying the most appropriate locations to direct housing growth. In particular, Yarnfield (identified as a Large Village in the Settlement Assessment) provides a strong location for major housing growth due to its current function as a key service centre. Medium and smaller settlements, such as Swynnerton and Cold Meece, also provide sustainable opportunities for growth.

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

The new Local Plan should make provision for flexibility to allow a mix of housing types to be provided. This should be based on the latest evidence, for example the SHMAA. Although evidence based, the plan should not be overly prescriptive in dictating required housing mixes and each site should be assessed on its individual characteristics and location.

This flexibility is required to ensure that the right housing product is provided in the most appropriate location. Therefore a generic mix for the whole district would not provide an appropriate degree of flexibility on mix and dwelling type. This is important to ensure that locations for new housing identified as suitable in the new local plan can be delivered appropriately.

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

On large development sites, there is a question mark over how self-build could affect delivery rates. More information is required on delivery and how appropriate local plan policies will be applied. It is considered the provision of self-build plots should be left to the discretion of the developer based on market trends, which are liable to change over the Plan period. It should also be to the developer's discretion based on viability. It is appropriate for such provision to be encouraged through development proposals, subject to viability, rather than through policy, which would impose an unjustified requirement on developers.

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

N/A

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

A key challenge facing the Borough's town, village and neighbourhood centres is the capacity and provision of suitable community and public services. The viability of such uses is increased through the provision of residential development, which increases the number of residents who support existing and new facilities. Provision of new and upgraded community facilities will be enhanced where sites with sufficient critical mass can provide support for the delivery of new facilities. Sustainable housing growth in smaller villages also provides the opportunity to support such settlements to grow and thrive. This is recognised and promoted in the revised NPPF (paragraph 78) and the Local Plan should be prepared accordingly.

From: Ben Weatherley [REDACTED]
Sent: 18 September 2018 11:53
To: forwardplanningconsultations
Subject: Representations on New Local Plan: Scoping the Issues
Attachments: Scoping the Issues Representations Form - Jonathan Lloyd Developments Limited - 2018.09.18.pdf

Good morning,

Please find attached Representations Form on the New Local Plan Scoping the Issues Report, submitted on behalf of Jonathan Lloyd Developments Limited (and other landowners of the land at Hixon Airfield that was the subject of our 2no. January 2018 Call for Sites submissions).

Kind regards,

Ben

Ben Weatherley
Partner

Knights plc
[REDACTED]
[REDACTED]
[REDACTED]

Knightsplc
[REDACTED]

Part A

1. Personal Details*

*If an agent is appointed please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Mr	Mr
First Name	Jonathan	Ben
Last Name	Lloyd (and others)	Weatherley
Job Title (if applicable)		Partner
Organisation (if applicable)	Jonathan Lloyd Developments Ltd (and other Landowners)	Knights plc
Address Line 1	Hixon Airfield Industrial Estate	
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone Number	c/o Agent	
E-mail address	c/o Agent	

Name or Organisation	Jonathan Lloyd Developments Limited (and other Landowners)
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Part B – Please use a separate sheet for each representation**Name or Organisation****Jonathan Lloyd Developments Limited (and other Landowners)****Question 1**

What would you like the Borough to be like in the future?

To be a vibrant, modern, forward thinking Borough featuring a good number, range and variety of sustainable, accessible settlements within which local people can live and work and in turn deliver a high quality of life for residents in and around the Borough.

As part of the above, to accommodate/offer a wide variety of types of housing and employment opportunities, as it is considered that a greater diversity in these respects - including in relation to both the types and locations of housing and employment and any enhancements to infrastructure and/or community facilities that can be achieved as part of such developments - would enhance the sustainability of the Borough, its prosperity and ultimately the environment and quality of life of local people.

Question 2

What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?

To provide a greater focus on delivering rural housing and economic development that would serve the rural community in accordance with paragraphs 78 of the National Planning Policy Framework (the 'Framework') as well as respond positively to paragraphs 83 and 84 of the Framework).

To deliver controlled growth in a wider variety of locations than the existing Local Plan allows for, including by way of increased levels of housing and employment development in sustainable locations in the rural area - and securing improvements to local infrastructure and community facilities where possible in association with such development.

In order to deliver these key outcomes it is considered important for the Local Plan to be aspirational in terms of its aims to deliver the necessary amount of new housing and employment in appropriate locations to serve all aspects of the Borough's population.

It should take full advantage of opportunities to deliver new developments on suitable sites in rural locations which can in turn contribute towards supporting the economy of rural areas in accordance with paragraphs 79 and 84 of the Framework which seek to provide good quality homes and places to work in accessible locations for rural communities and support the rural economy, thus enabling the sustainable growth of rural neighbourhoods and enhancing the quality of life for local people.

Scoping The Issues Report: Response Form

Question 3

Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighborhood to make it a better place to live?

With regard to our client's businesses and land interests in Hixon specifically, we would urge the Council to prepare a new Local Plan that facilitates the provision of a level and nature of growth that would enable the provision of new and varied job opportunities, more places to live and a wider range of community facilities. It is considered that doing so would enhance the sustainability of the village and in turn reduce the need to travel, with resulting benefits for the environment and quality of life of local people.

This could be realised by taking the opportunity that has been presented (including by way of our Call for Sites representations in January 2018) to redevelop land at Hixon Airfield to provide a science, technology and commerce park, housing, public open space and local/village centre that could deliver community facilities including some or all of a school, shops, medical and religious facilities.

Our client is in the process of collating further information on the development potential/deliverability of their land in Hixon to inform the Council's assessment of it and the strategy for growth of Hixon and development in the wider rural area and Borough as a whole.

Question 4

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

By promoting the redevelopment of a range of sites within rural areas, which can be accessed by the rural community, to deliver residential and economic development commensurate with the respective villages and the surrounding rural communities in accordance with paragraphs 78, 79 and 84 of the Framework.

It could also support the growth, vitality and sustainability of local villages by taking any suitable, available opportunities to enable the delivery of housing and/or economic development that could also deliver infrastructure improvements and additional community facilities (both of which apply to our client's land at Hixon Airfield as outlined in our Call for Sites representations in January 2018).

Question 5

Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?

It is considered that the new Local Plan should set a target minimum density for town centre locations and at each level of the settlement hierarchy, but in doing so also acknowledge that each individual development will need to be treated on its own merits at planning application stage.

Question 6

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?

If the Council cannot find sufficient PDL sites to meet the need for housing and employment requirements then, in accordance with paragraph 117 of the Framework, it should firstly consider sites that contain a mix of brownfield and greenfield land before considering sites that are entirely greenfield.

Our client's land at Hixon Airfield presents an excellent opportunity - that is unique to the Borough - to deliver meaningful contributions of housing and employment development and associated community facilities and infrastructure improvements (as set out in more detail in our January 2018 Call for Sites submissions) within a former airfield that comprises a mix of brownfield and greenfield land.

In doing so the development that could be accommodated within the site could in turn reduce the pressure on Stafford, Stone and other larger villages with less obvious and suitable meaningful development opportunities to accommodate the development needs of the Borough to 2040.

Scoping The Issues Report: Response Form

Question 7

National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?

We do not consider that any specific types of housing are most needed in the Borough, but that in the interests of achieving the sustainable growth of the Borough and other key objectives/outcomes outlined in responses to questions 1 and 2, it would be expedient for the new Local Plan to encourage and facilitate the delivery of a wide range of types of housing in a variety of locations across the Borough.

This should include the delivery of greater levels of housing in the rural area that are of a type/design and density that respect their local setting - and the delivery of sufficient housing to meet the needs of the ageing population (as highlighted in the consultation document) is an important objective. A good proportion of new housing for older people will need to be accommodated in the rural area and it is considered important for the new Local Plan to acknowledge and plan for this and the maintain and where possible enhancing of local community facilities to serve such residents and the rural population overall.

Given the scale of our client's land at Hixon Airfield it clearly has the ability to accommodate a good number and mix of housing and to deliver additional community facilities to serve and enhance the quality of life of existing and new residents in and around the village.

Question 8

The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?

No comments.

Question 9

National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing which includes pitches for gypsies, travellers and travelling show people. Where should the Council look for suitable brownfield sites for new pitches?

No comments.

Question 10

What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

Creating an increased focus on providing new residential and employment development within the rural areas (in locations that are or can be made sustainable) in accordance with paragraphs 78 and 83 of the Framework.

The potential of our client's land at Hixon Airfield to make a meaningful contribution in this respect has been outlined elsewhere in these representations and within our January 2018 Call for Sites submissions.

Scoping The Issues Report: Response Form

Question 11

Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?

Yes, particularly within the rural area where it is necessary for new sites to be provided that can provide new and improved facilities including to meet modern business requirements in accordance with paragraphs 11 and 83 of the Framework.

The potential of our client's land at Hixon Airfield to provide additional employment development alongside the existing Hixon Airfield Industrial Estate RIE - perhaps in the form of a science, technology and commerce park that would deliver jobs of an alternative nature to those available within the existing local RIEs - has been outlined elsewhere in these representations and within our January 2018 Call for Sites submissions.

Question 12

What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?

The need to provide housing and employment development where it is appropriate in order to meet the aspirations of the wider Borough and to compete with adjacent local authority areas (in order to avoid outward migration and resulting reduced demand for/use of local centres).

Maintaining viability and a range of services within town, village and neighbourhood centres is a key challenge in these times where the likes of online facilities (shopping, etc.) have adversely affected vitality and vibrancy of such centres. Drafting the new Local Plan to facilitate sustainable growth across the Borough, including in the rural area (including in and at appropriate sites near to villages of all sizes), would help to maintain and enhance the important role of town, village and neighbourhood centres.

Question 13

What improvements would you like to see in those centres that you visit regularly? Should additional uses be supported other than retail such as residential, entertainment and restaurants? Please state the name of the centre in your response.

As set out in response to earlier questions and within our January 2018 Call for Sites submissions, our client's land at Hixon Airfield has the strong potential to deliver material improvements to the number, range and quality of local services/facilities in Hixon by way of the provision of a new local/village centre to serve both the proposed additional housing and economic development within the site and the existing local community. Such a new centre could deliver community facilities including some or all of a school, shops, medical and religious facilities.

Question 14

What are the best locations for new retail and leisure development in the Borough and how can future development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?

No comments.

Question 15

Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres, and if so, where?

The provision of some offices in rural areas would support rural communities and the rural economy in accordance with paragraph 83 of the Framework.

As outlined previously in the event that the proposed housing and economic development within our client's land at Hixon Airfield were to come forward it would create the need for - and can clearly accommodate - provision of a new local/village centre within the site.

Question 16

What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?

No comments.

Question 17

National policy gives councils new powers to protect valued open spaces by designating them as Local Green Spaces. Are there any open spaces that are special to your local community which should be designated? If yes, please provide details of the open space, its location and the reason why it is special to you and your community.

No comments.

Question 18

What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?

As outlined previously in the event that the proposed housing development within our client's land at Hixon Airfield were to come forward it may create the need for - and can clearly accommodate - provision of a new school within the site.

Question 19

19a What new health, social and community facilities do you think are needed in the Borough to support both new and existing communities?

As outlined previously in the event that the proposed housing and economic development within our client's land at Hixon Airfield were to come forward it would create the need for - and can clearly accommodate - provision of new health, social and community facilities within a new local/village centre within the site.

19 b) Where should these be located/go?

See above.

Question 20

What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?

Support more housing and employment sites in rural locations in order to serve the rural community and thus reduce emissions as a result of the reduced need to commute in accordance with paragraphs 78 and 83 of the Framework.

Spreading housing and economic development across the Borough rather than directing it primarily to larger urban areas would reduce congestion and associated pollution / air quality problems in and around the larger urban areas.

Question 21

There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?

The Plan could facilitate higher levels of housing and employment growth in the more sustainable locations in the rural area to improve the prospects of existing local services being maintained - and also facilitate provision of additional local services within the rural area in tandem with future growth - in order to reduce the need to travel long distances and maintain and increase the potential for/frequency of trips within the rural area to be undertaken using sustainable modes of transport.

Question 28

What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?

No comments.

Question 29

The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

No objections to a Green Belt review. Notwithstanding this, rural sites outside of the Green Belt should be considered preferable to Green Belt release in terms of their potential to deliver economic and residential development. Our client's land at Hixon Airfield is located within the rural area and has the potential to make a significant contribution to future economic and/or housing needs in the rural area without affecting the Green Belt - and would in turn reduce the pressure for growth in areas that would affect the Green Belt.

[REDACTED]
[REDACTED]
[REDACTED]
Dear [REDACTED]

Ref: Falmouth Avenue Green Space.

We fully support the Falmouth Action Group in their endeavours to keep the Green Space on Falmouth Avenue and having it designated as a Local Green Space to help with the Health & wellbeing of the Community in the area of Baswich.

We would wish to refer to the representation we made previously supporting this matter.

Yours sincerely

Cllr. P Farrington
Cllr. A. Edgeller

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
13/09/2018

Dear [REDACTED]

Local Green Space – land off Falmouth Avenue

In response to the latest local planning consultation, you are already in possession of the detailed submission, written on the standard form, made earlier this year and it is still relevant. However the headcount / footfall figures, as stated in the document, are out of date.

We have completed a large survey of the people who use the land and these user report details have been collated, analysed and are enclosed along with letters of support from residents. Also the detailed bird Survey from [REDACTED]

We still wish that the land off Falmouth avenue be considered for Local Green Space status as part of the new local plan and look forward to receiving further consultation / information in the future.

I hope that this is what you will need but if you require any other information then please let us know and we will try to provide it for you.

Yours Sincerely

[REDACTED]
Jo & Ted Bailey

On behalf of Falmouth Action Group

Analysis of Usage Survey for the land off Falmouth Avenue

September 2018

The data collected, from the 550+ residents who responded to the survey, (see attached analysis and summary) shows how much the site is used. The longest living person has used the site for 72 years but the data shows that all age groups use the site.

There are many dog walkers who use the site and without this land they perhaps would have to go to a children's play area such as the one on Yelverton Avenue.

The majority of people use the site for exercise, relaxation, fresh air and to socialise with their friends, which is an important aspect of health and well-being. Were the land not available then people would probably drive their cars towards Cannock Chase on our already congested roads to get open green space.

The number of people who bird watch or watch the bats hunting in the evening or take children to see the rabbits etc. and teach them about the countryside indicates the vibrancy and diversity of the environment. (See the bird survey from [REDACTED]). In fact none of our data indicates the number of children who accompany adults.

Bird Report for the Proposed Local Green Space Land off Falmouth Avenue

Information Source

Living locally, just four hundred metre's to the west, and as part of my local bird watching activities, I've visited this site and the surrounds for the previous thirteen years. Up to September 10th 2018, six hundred visits have been made.

All my sightings (per visit basis) are uploaded to the national on-line 'Birdtrack' data logging system (managed by the British Trust for Ornithology) and the following species & sightings information has been extruded from my personal records on this archive, in conjunction with hand written notes.

Personal Details

I am a life-long Ornithologist/Birder and have observed birds all over the U.K and abroad. I do annual Breeding Bird Surveys for the British Trust for Ornithology in Staffordshire, took part in surveying Cannock Chase for the comprehensive report into the Birds of Cannock Chase. I undertake volunteer work in the capacity of managing the habitat & Environmental Stewardship Scheme, for Belvide Reservoir SSSI Bird Reserve in Staffordshire, on behalf of the West Midland Bird Club registered charity. I also act as the Press Officer and Twitter Account Manager, plus I'm an elected member on the management team of the Club.

Site Habitat Features

The proposed Local Green Space site has some interesting and important habitat for birdlife and during the years I've been visiting, has matured into an 'oasis', sandwiched between the surrounding urban area and railway line and farmland. The topography of the site and its elevated position on the south side of the River Sow valley has made it a focal point for breeding, foraging and migrating birds.

For such a compact area, there is a various mosaic of habitats. From Falmouth Avenue, a rough existing semi natural grassland area, with scattered old fruit trees is bordered on its northern edge by a mature, hedgerow with under-storey of scrub and bramble. This mixed hedgerow/scrub contains many, fruit bearing species e.g. Hawthorn, Elder & Holly providing sustenance & nesting sites for a variety of bird species.

North of the hedgerow there are two grassland plateau's interjected with three sheltered valleys, running north to south. The plateau's have areas of rough and short cropped grassland, the latter being a scare habitat in the area and this being very important to foraging ground species, several of which are amber rated on the national 'Species of Concern List'. The larger plateau area to the East

contains a small copse area at its highest point containing several mature trees with a varied understory of smaller oak, birch, old fruit trees and bramble scrub.

The sheltered valley areas have matured into a striking bird habitat, which attract breeding species and also migratory birds looking for shelter and to forage. These sheltered valley areas contain some of the best bird habitat on the proposed green space and are secluded enough to be relatively undisturbed by users of the area.



Bird Species Observed on Site and Their Status

Song Thrush – the short grass plateaus are extremely important foraging areas, for this ground feeding species. Five breeding pairs were present on the area in spring 2018, with the dense scrub areas providing ideal nesting habitat. This is a high density for a small area. Song Thrush are red listed on the 'Birds of Conservation Concern' List and have declined nationally by 50% over the period 1970-2015 in the 'State of the UK's 2017 Birds by the British Trust for Ornithology (BTO)

Green Woodpecker – observed on many occasions, another ground feeding species which relies on short cropped grass areas to successfully feed. In recent years, juveniles (reared in adjacent woodland) have been observed feeding on the short cropped grass, (by rabbits) plateau areas. Green Woodpecker have increased by 31% between 1995 & 2015 and these ideal feeding areas, have helped this.

Willow Tit – is now a scarce species in Staffordshire. A single pair has raised young at a nesting site in the adjacent wet woodland. In the Spring of 2012, a pair was observed feeding four recently fledged young. Willow Tit has declined in population by 80% in the period 1995-2015. Willow Tit is red listed on the 'Birds of Conservation Concern',

House Sparrow – this species has declined in population by 66% since 1970 and is rated red on the 'Birds of Conservation Concern' list. This urban species turns highly insectivorous when breeding and natural areas, like the land off Falmouth avenue, are very important feeding areas, as urban gardens have become more 'sterile' in style. Small mixed age flocks, can be seen on the area all year round.

Starling – is present all the year round on the site, and the grass plateau areas are very important foraging areas for the species. Several pairs breed in cavities in the mature trees on the development area. Starling are a 'Conservation Concern List', red rated species with national declines of 51%, 1995-2015, stated in the State of the UK's Birds 2017. Like the House Sparrow, an urban species affected by the modern sterile garden, reducing their feeding opportunities, as such heightening the importance of adjacent natural feeding areas, like the proposed local green space site.

Willow Warbler – this summer visitor returned to the site, in 201. Two singing males were holding territory in the early Spring of 2014, and adults were observed carrying food in early June, indicating probable breeding on the site. 2017 & 2018 have held singing males in the Spring & birds still present in the summer, indicate probable breeding. This species is found typically in scattered scrub areas and breeds in rough grassland, present on the site. Willow Warbler is amber rated on the 'Birds of Conservation of Concern' list with a decline of 11% between 1995 & 2015.

Whitethroat – another summer migrant which has returned to the site, and has bred every year since 2014 to date. A family party can usually be seen in the scrub area of the site and numbers are swelled in the autumn with birds feeding on elderberry, prior to migration. Another amber listed species, which has declined in farmland and requires natural scrubby areas to breed.

Bullfinch – a secretive species which is observed all year round on the site. The mature hedges and scrub are very much to its liking and juvenile, (who are site specific) have been observed every year since 2014 indicate probable breeding in the scrub areas. Bullfinch is amber rated on the 'Birds of Conservation Concern' list., but has shown a recent, slight national recovery, in the 'State of the UK's Birds report.

Reed Bunting—attracted to the rough grassland of the site, off Falmouth Avenue, particularly in winter to feed on fallen grass seed heads. This is an amber rated species on the 'Birds of Conservation Concern' list.

Dunnoek— this species frequents and breeds in the scrub areas of the site and also uses the short grass plateaus for foraging. A common bird, that can be seen daily.

Linnet— this farmland species has declined by 21% during the period 1995-2015 and is red listed on the 'Birds of Conservation Concern' list. Positively, this species has recently increased on the proposed green area, as the gorse and scrub areas have expanded, in turn providing better nesting sites. Juveniles have been observed being fed, in the last two Springs of 2017 & 2018. On occasion, in winter, small flocks are observed feeding on the seed heads in the rough grassland areas, of the site.

Kestrel— this declining species is amber rated on the Birds of Conservation of Concern' list, with a fall of over 38%, in the period 1995-2015. This species hovers/hunts frequently over the rough grassland areas of the site and breeds within 1km distance.

Grey Wagtail— this species has bred at a canal side location, adjacent to the proposed local green space area. As some other species, the Grey Wagtail requires short cropped grass areas to forage, as in the short grass, plateau areas. Records occur of it here, generally in the spring breeding months.

Mistle Thrush— another amber rated species on the 'Birds of Conservation Concern' list with a decline of 25% over the period 1995-2015, in the State of the UK's Birds Report 2017. In recent seasons this species has been observed singing from the tops of the tallest trees on site, and occasionally feeding on the short grass plateau areas.

Fieldfare— this winter visiting Thrush, in recent years has took advantage of the many foraging opportunities on the site. It can be seen feeding on the berry bearing shrubs, the old fruit trees on site and also on the short grass plateaus. On occasion dozens of birds are involved.

Redwing— as the Fieldfare, this shy winter migrant visitor, has increased in recent winters, due to the same feeding opportunities on site and is present throughout all the winter months.

Brambling— this winter visiting species, from Scandinavia, continues to use the site in recent winters. This is no doubt, due to the development of the scrub areas which contain many fruit feeding opportunities for it. It has also been observed feeding on the ground, under the scrub, on the eastern plateau.

Goldfinch— this species can be seen frequently all the year round, feeding on the seed heads of plants growing in the rough grassland areas. As in 2018, recently fledged young observed year on year would indicate continuous breeding on the site.

Greenfinch— This nationally declining species (46% decline 1995-2015) fortunately, can be seen all the year round on site. The continuing presence of juveniles every breeding season, would indicate that the site is very favourable for them.

Lesser Redpoll— this small finch is attracted to feed on to the site, by the many plants that run to seed, particularly on the grassland areas. It's mainly observed in winter period.

Siskin – another small finch, which is observed on site every winter. It is attracted in by the foraging opportunities of the various tree species.

Chaffinch – present all year round and the area holds 5-8 breeding pairs.

Hawfinch – a new, rare species logged on the site, since the last 2014 report. Four birds were observed on the 28th October 2017 in the tall Sycamore trees on the site. Part of a national influx of the 2017-18 winter.

Blackcap – a summer visitor which can be readily observed on site over the relevant months. Adults observed carrying food, indicate breeding on site in 2017. Interestingly in the previous some previous winters, individuals of probable north European origin have been observed in the scrub areas...probably due to the good foraging & cover opportunities.

Chiffchaff – as the Blackcap, observed carrying food annually, so a probable breeder in the scrub areas of the site. Recently increased to 3-4 pairs, the birds are generally present through the summer months, with numbers being swelled during migration periods.

Garden Warbler – individuals of this scarce, summer visiting Warbler have been present in recent springs, since the site has matured. A singing male, once again holding territory in June 2018 and the species being observed throughout the summer, indicates probable breeding on site. This species nationally has declined by 23% in the period 1995-2015

Lesser Whitethroat - this uncommon species has recently, as of 2018, bred on the site, in the western valley scrub area. Recently fledged young, observed being fed by the parents in July 2018. The species is also seen in the late summer period, 'feeding up' in the elderberry scrub before its migration to Africa.

Great Spotted Woodpecker – a daily visitor to the site and can be heard drumming in late winter/early spring. Several of the mature Oaks provide potential nest sites.

Hobby - this aerial species continues to breed within 1km of the proposed local green space. Due to the natural vegetation of the site holding good insect populations, this specialised feeding falcon is attracted in, to hunt low over the site, during the summer months.

Buzzard – the species breeds in the adjacent river Sow valley. A considerable part of its diet is Rabbit based, and it can be occasionally seen on the site (usually early morning) patiently hunting the good Rabbit population, on the grassland areas.

Sparrowhawk – this species breeds less than a 1km to the north of the site. Regularly seen hunting at/attracted to the site, by the presence of the good amount of passerines, due to the existing quality habitat.

Grey Heron – as the Buzzard, individuals from the adjacent river valley can sometimes be seen, walking over the short/rough grass areas hunting small mammals and rabbits.

Nuthatch – a regular occurring species, seen foraging in the area. An adult carrying food in spring 2012, 2017 & 2018 indicates probable breeding in the mature Oak trees on site.

Treecreeper – a secretive species, which uses the mature Oak trees on site to feed upon. Has bred on the site, several times, in recent years.

Blackbird – seen on a daily basis and 8-10 pair's breed on site (this is a good density due to the nesting habitat and feeding opportunities). Particularly favours the short cropped grass areas of the site. The numbers are swelled in winter to in excess of 30 birds, mainly due to the berry/fruit bearing trees and shrubs in the scrub habitat.

Blue Tit – a daily visitor on the site. An annual breeding species, with the mature tree on the proposed green space, providing plenty of nesting sites.

Great Tit – A regular breeding species, observed all year round on the site.

Coal Tit – a probable breeder in the adjacent conifer plantation, this species can regularly be seen foraging in the important scrub habitat of the site.

Long tailed Tit – the mature hedge line and scrub habitat of the site provides the perfect nesting conditions for this species. Birds have been observed carrying nest material and food in last two springs, indicating certain breeding on site. Confirmed breeding attempt in 2018.

Goldcrest – this increasing species can be seen fairly regularly, foraging in the scrub areas of the site. Commutes between the site and the adjacent conifer plantation, where it breeds annually.

Robin – an ever present species on the site, due to the feeding and nesting opportunities. A confirmed, annual breeder, with over three pairs fledging youngsters every year.. It particularly favours the grassland and scrub areas.

Wren – another common species on the site, with over ten pairs breeding. As with many species, the scrub habitat of the site (lacking in the surrounding area) is vitally important for foraging.

Meadow Pipit – a winter/early spring visitor to the site, that has been observed feeding on the short grass plateau and rough grassland areas. Since the report of 2014, this species has increased in the local area and the cropped grassland plateau's have become even more important for feeding areas.

Pied Wagtail – a regular species observed feeding on site. Prefers the short cropped grass plateau area. Breeds in the adjacent urban area.

Yellow Wagtail – A cereal field species, but none the less has been observed foraging on the short grass plateau areas.

House Martin – this summer visitor is a numerous, regular breeder, on the properties in the vicinity of the proposed green space. Naturalised areas such as the proposed local green space site, are important, as they hold a significant higher percentage of insect populations, than given urbanised or farmland areas of the same size. Thus the greater amount of airborne insects above naturalised sites, are important for aerial feeding species like the House Martin. An amber listed species on the 'Birds of Conservation Concern' list. Has suffered a 11% decline in the period 1995-2015

Swallow – like the House Martin, the Swallow can be seen daily in the summer, feeding over the site, although it breeds in suitable locations in the wider area, rather than on adjacent properties. An amber rated species.

Swift – this declining, aerial feeding, summer visitor, generally feeds at higher altitudes than the former, above two species. On occasion though, during inclement weather, it will feed low over the site, sometimes in considerable numbers. An amber rated species. The presence of 'screaming' family parties in late summer, indicates it probably breeds in some of the older properties, near to the site.

Redstart – just three records for the site in the autumn period. All sightings have been in the valley scrub area, indicating how attractive these areas are to migrating birds, as a 'drop in' feeding opportunity.

Spotted Flycatcher – at the beginning of the observation/recording period, a pair of this red listed species bred at a canal side location, adjacent to the development area. In recent years, singletons have been observed on the green space, passing through on migration.

Stonechat – This species breeds on Cannock Chase, several kilometres to the south east. During the winter period, the Species has been observed using the rough grass areas of the site for foraging, especially if hard weather is in place.

Wheatear – a very recent, good addition, to the list of birds for the proposed Green Space. A migrant female bird, observed feeding on the short grass plateau areas, on the morning of the 2nd of September 2018.

Yellow-browed Warbler – this nationally extreme rare visitor, (attracting many observers) was present at the east end of the site and the adjacent conifer plantation during one and half months of the 2005/06 winter. An example of how an untouched, 'naturalised' site can be an attraction to rare and commoner species alike.

Waxwing – the winters of 2009/10, 2010/11 & 2012/13 saw a large influx of these winter visitors from Scandinavia. This predominately fruit eating species, was attracted in to feed at the site by the abundance of mature hawthorns, old apple trees and other berry bearing species.

Carrion Crow – an ever present bird on the site. Can be seen foraging on the grassland areas and has bred in the taller trees on site.

Jackdaw – a regular, daily visitor to the site, feeding in the areas as the Carrion Crow. Also, a breeding species in the Oak trees on the site. (Has been observed carrying food and nesting material)

Magpie – status on the site, as the previous two Corvid species. It nests in the mature hawthorn hedge on site.

Jay – a more secretive Corvid species, but seen all year round, particularly in autumn on the site. Several birds at once, have been seen foraging in the scrub and rough grassland area but especially in ground cover underneath the mature Oaks, on the eastern plateau.

Collared Dove – a common species, the taller mature hedge lines, providing its annual nest site requirements. Can be also seen feeding on the ground on the short cropped grass plateaus and rough grassland.

Stock Dove – a species which breeds in the adjacent river valley area. Has been observed displaying and nest site prospecting in the larger trees, on the proposed green space site.

Wood Pigeon – a species seen daily on site, attracted in by the many foraging opportunities. Two to four pairs breed on site.

Mallard – surprisingly can be seen wandering and loafing on occasion, on the short grass plateau areas of the site.

Pheasant – more than a handful of observations of this non-native species, feeding in the grassland and scrub areas of the site, generally in the early morning. More than likely 'over spill' birds released for shooting, in the surrounding rural area.

Tawny Owl – annually heard at night, calling on site during the late winter/early spring 'pairing up' season. Breeds in woodland, adjacent to the proposed local green space site and due to the ideal habitat for its mammal prey, is a nocturnal hunter on the site.

Barn Owl – this amber rated species on the 'Birds of Conservation Concern List' has been observed hunting at dusk on the rough grassland area immediately off Falmouth Avenue, in autumn 2012, 2016 & 2018 This species breeds, intermittently 1km to the north-east and is probably hunting in this area, due to the high mammal population in its ideal grassland hunting habitat.

Additional Species Records for the site (from third party observers)

Little Owl – several records of this species roosting in several of the mature Oaks on site. Very occasionally seen hunting from the mature hedge line in the rough grassland area.

Bird Species Summary for the Site

Number of different species-total for the site	: 66
Birds of Conservation Concern List – Red rated	: 11(3 species breeding)
Birds of Conservation Concern List – Amber rated	: 12 (3 species breeding)
Number of breeding/probable breeding species	: 25

Any on-site visits, even if in the hundreds, are only a snapshot of that moment in time, of the different species on site. The confirmed sightings records of a total of sixty six species, twenty five of these breeding, indicate the importance of the naturalised quality of the proposed local green space, to a variety of birds. This includes eleven 'red listed' birds that have been observed on site with

Subject: Local Green Space Off Falmouth Avenue

From: [REDACTED]

To: [REDACTED]

Cc: [REDACTED]

Date: Tuesday, August 14, 2018 6:38 PM

Sir/Madam,

I have lived in Baswich since October 1999, and for the last 19 years the green area off Falmouth Avenue has been of great benefit. Over that time myself and my family have used this area daily for walking our dogs. As my children have grown up this area has been used as a free space to sledge, play games, build bases...etc. With children becoming more and more home bound because of electronic devices, these free green areas are even more important for future generations to be able see, feel and experience nature first hand. Manmade areas are fine for ball games and play parks but wild flowers, rabbits rope swings and insects are not part of these areas.

Studies have shown that children that play outside doing the things that this green area allow have better mental health, and the likelihood of being diagnosed as suffering from dyspraxia is reduced . My question to you is "Would you give away an heirloom or rip up a painting knowing that once destroyed you will never get it back?"

It is wild areas like this that make memories!

Regards

R. Travis

[REDACTED]


Date: 02/09/2018

Forward Planning
Civic Centre
Riverside
Stafford
ST16 3AQ

Dear Sir,

Application for Local Green Space – Land off Falmouth Avenue

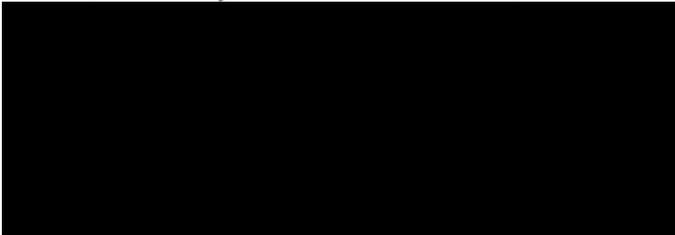
I would like to ask you to consider the land off Falmouth Avenue to be designated as a Local Green Space.

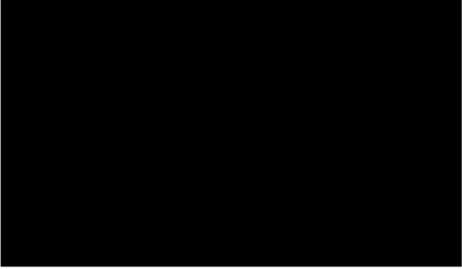
I believe that the land in question meets the three criteria as laid down to define Local Green Space. The area is very close to housing and easily accessible by foot in a matter of minutes for anyone in Baswich and I believe it is not a major piece of land because of its site and situation. The land is unique to the Baswich area and there is nothing even vaguely similar to it. It has grassland, copses, mature trees and animals, insects and birds in abundance and has two deep gullies running across it. It is unlike cultivated land because it is essentially wild and natural which is why it is so cherished by local adults and children.

I have lived here for over twenty years and I have enjoyed the amenity for dog walking in the past. I still use it for exercise by regularly walking and cycling across the land. I am retired and while exercising on the land I meet other local residents and make new friends who I wouldn't be able to meet if I didn't use the land. I live right opposite one of the main pathways across the land and from my lounge I daily see from dawn until dusk dozens and dozens of people using the land. In fact I've seen people dog walking at night by torch light. Also whilst enjoying the open space I see joggers, bird watchers, children playing, cyclists, ramblers, fruit pickers collecting crab apples, blackberries and elderberries, family groups, dog walkers, photographers etc. I also collect any litter which I come across and responsibly dispose it.

It is so special to the community that I hope that you will deem this land to be designated as Local Green Space.

Yours Sincerely


Brian Armstrong



22 August 2018.

Dear Sir/Madam,

Open Land of Falmouth Avenue, ST17.

I refer to the open land off Falmouth Avenue, Baswich, Stafford. As you are no doubt aware this is a piece of uncultivated land, unspoilt, with trees, hedgerows, wild flowers, birds and animals. We as a family have used the land for the last forty one years for such purposes as walking, dog walking, nature trails, winter sledging and many other activities with children. This is paramount to the health and welfare of people in general.

The land is used by many for differing activities, only earlier today a group of ramblers had assembled, before starting their trek down to the canal, which must be one of the most picturesque stretches of canal in the country.

There are no other areas of land in the vicinity which one could term as open land. Much is said about how much obesity costs the National Health Service in health care. Surely it makes sense to provide facilities for people of all ages to be able to freely exercise in the hope that it will help to combat illness.

We therefore ask that serious consideration is given to designating the piece of land off Falmouth Avenue as an Open Space, not only for recreational use for residents and visitors to the area but also for the well being of people.

Thank you.

Yours sincerely,

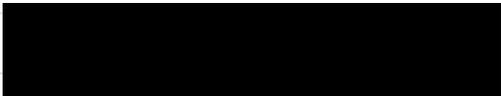
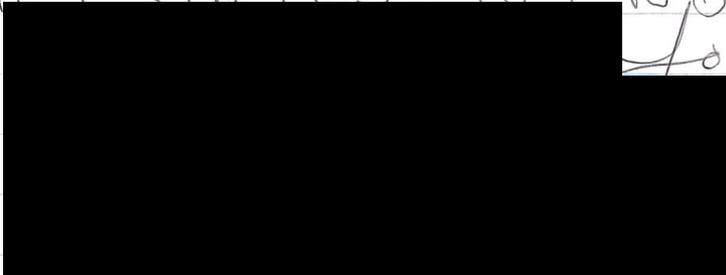


Margaret and Alec Salt.

FALMOUTH AVENUE
GREEN AREA USAGE STATEMENT.

SINCE MOVING TO AREA OF BASWICH
WEeping CROSS AREA IN 1970, WE
AND THE TWO CHILDREN, AND THEIR
CHILDREN, HAVE HAD WONDERFUL
PLEASEING PLEASURE USING THE
LOCAL GREEN SPACE, OFF FALMOUTH
AVENUE, AND WOULD LIKE TO HAVE
THE AREA SAVED FOR FUTURE FAMILIES
OF THE ESTATES TO ENJOY.

Louise



Subject: Falmouth fields
From: [REDACTED]
To: [REDACTED]
Date: Monday, July 23, 2018 10:31 PM

Hello [REDACTED]

You don't know me but I grew up as a child on Torrington Avenue in the 1970s. Back in those days we used to play on the fields beyond Falmouth Ave for hours on end, especially in the summer holidays. We made dens in the long grass and conkering in the fields beyond.

My mother who is now 82 reminds me of the time when my friends came knocking at our front door and asking "is Neil in? He's the best snake catcher!" Yes we used to see Adders basking in front of the Holly bushes growing in the hedgerows. Though we never caught any! We also watched skylarks hovering above our heads which would land far from their nests then run to their nests hoping we wouldn't find their eggs.

Another big event which brought the community together on the fields was bonfire night with several bonfires dotted along the fields. Residents would supply us with Baked potatoes, sausages and Parkin!

As you will realise I have fond memories of the fields and the canal and river beyond. Last week after forty years I returned to visit my old haunts and was thrilled to see this part of my childhood hadn't changed that much apart from old chestnut tree was gone and barbed wire fences had been removed. I spoke to lots of dog walkers and reminisced with an elderly couple living on Falmouth Ave. They were really worried as they had seen me taking photos and thought I was from the council planning dept or similar.

Looking around Stafford I noticed a lot of old buildings falling in disrepair and many empty retail units etc. Surely if more housing is required the town centre is where it should start. This would bring new life back into town and leave our beautiful countryside to be enjoyed by future generations.

I really hope you can win the fight to get Falmouth Fields designated as a Local Green Space. Although I no longer live in the area I would like to help if I can.

Regards Neil Braithwaite.

See attached pics from last Friday. Have posted on Stafford Today Our Town In Pictures

Attachments

- image5.JPG (356.27KB)
- ATT00001.txt (4B)
- image4.JPG (720.15KB)
- ATT00002.txt (8B)
- image1.JPG (547.86KB)
- ATT00003.txt (2B)
- image2.JPG (530.78KB)
- ATT00004.txt (2B)
- image3.JPG (769.95KB)
- ATT00005.txt (2B)

12/09/2018



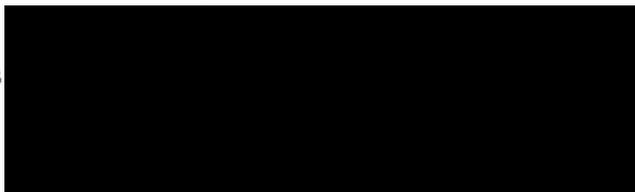
Local Green Space

I have used the open fields off Falmouth Avenue for 53 years. When my daughter was small my husband and I used to pick wild fruit and she would play happily in the fresh air and enjoy our picnics. Now I regularly take my daughters dog for walks not only for exercise but also to meet my friends who use the land. It is very good for me to relax and keep fit in this way.

I live opposite the land and every day I see lots of people when they are walking, running, rambling, collecting fruit, having picnics, playing with children, dog walking and meeting their friends. Sometimes I see three generations of a family all together.

This is the only open unspoilt space available to local residents and I hope that it won't be lost to the community in the future. It is important especially for people like me who don't drive.

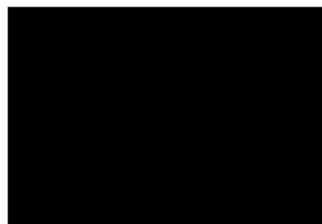
Yours



Margaret Cartwright

13th September 2015

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

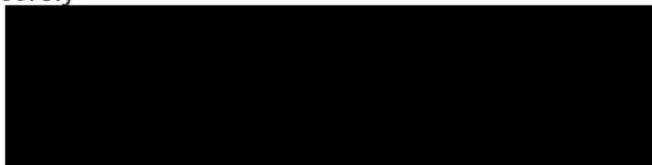


To whom it may concern

I have lived at my current address for 34 years and my house overlooks the open countryside of Falmouth Avenue. When my children were growing up they frequently enjoyed the open spaces of the fields to play in with their friends. From my home I overlook one of the main pathways to the furthest area of the fields. Over the years I have watched many residents of all ages. Families with pushchairs, teenagers, adults and senior citizens, many of whom I recognise as regular visitors. Often there are people walking with their dogs, many arrive at about the same time each day and can be seen chatting to their fellow residents.

It is a beautiful natural site and the only example of its kind in the Baswich area which lends itself to a wide variety of activities such as, playing with children and grandchildren, nature watching, wild fruit picking, cycling, running, hiking, walking dogs, picnicking, bird watching, and healthy exercise in the fresh air for all who use it.

Yours Sincerely



Mrs L J Bailey

57

Stafford Borough Council
re. Local Green Space
of Falmouth Avenue
Baswich
Stafford.

To Whom it may Concern.

I refer to the attached document.

When I last responded to the proposed provision of housing on this area I regularly used the land for dog walking and general "open space" recreation. Regretfully my age and illness preclude this now.

However it is in my belief that this open space is an essential asset to this area of Heaton. The land is very much used by young and old for outdoor activities which are essential in the age of increasing obesity. Open space is at a premium in Stafford. The provision of essential housing is very much in evidence in the area of Stafford and the Borough are to be much commended for this happening.

I do, therefore, request that the open space at Falmouth Ave. be left as it is to provide a natural "lung" to meet the needs of current developments.

Yours faithfully

MICHAEL A. GLOVER

Green Space off Folmoot Avenue

I write as a local resident. I think that it is very important that we do not lose our green space off Folmoot Avenue. The Weeping Cross estate is very short of green spaces and this one is important to us and is very well used.

It would be very wrong for this area to be built on and the local residents to lose the only green space that we have in this part of the estate

MICHAEL A. [unclear]

Miss Jane Menaley

17 August 2018

To Whom It May Concern.

PROTECTION OF OUR LOCAL GREEN SPACE.

I am registering my support for the continued recognisance of the Green Space off Falmouth Avenue, Baswick.

I have recently moved to this area and have visited/used this space on a number of occasions and regularly walk/run across the common ground. It is a fabulous recreation area for all locals from children on bikes, dog walkers and general public. It is evident that the land is respected by local residents on mass, always tidy and no litter left that

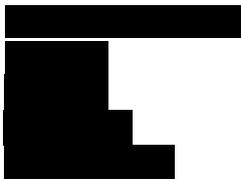
I have seen on any occasion.

I live on the [redacted] site off Baswick lane and though some of my fellow residents may not wish to individually write in support of the green space, I think it is important to add that I am aware of my neighbours also visiting the area. It is important to recognise the space and keep it green as many of the residents where I live do not drive / have no access to transport; and therefore this is their immediate access to a safe and pretty place in which to stroll / take a walk.

Yours faithfully

[redacted]

Mrs Alison Parkes



Falmouth Action Group
63 Falmouth Avenue
Stafford
ST17 0JG

29th August 2018

Ref: Falmouth Avenue Green Space.

To whom it may concern.

Re: Green Space

I am writing this letter to support the Baswich Community regarding the local green space on Falmouth Avenue.

This space is very important to my family and I and we would like to see it continue to be a local open green space.

We use this space for walking our dog, and exercising. We meet other dog walkers there which allows us to get together to exercise and chat which is a wonderful way to meet other people.

There are a few people I bump into that live on their own and this is the only way that they get to interact with others, this is a vital part of their social life for them. If this was taken away then those people would probably not see anyone from week to week.

The space itself has a wonderful abundance of wildlife that can be seen as you walk through, which gives you a great sense of wellbeing and helps you relax as the area is very tranquil and beautiful.

As the area is constantly being expanded with new houses I feel that we must make sure that we keep our open green spaces so that we do not become a community of houses which eventually creates a community of people that do not interact or look after each other. Stafford is well known for its green spaces, historic land marks and beautiful views, its kind and generous people and community spirit.

We moved to Stafford to be part of all this and be surrounded by wonderful views and people. I hope that this letter gives some support for keeping our green space's open and protected.

Yours faithfully

Mrs Alison Parkes & family.

[REDACTED]
[REDACTED]

29th August 2018.

Dear Sir/Madam

Re: Land off Falmouth Avenue

This land is a much loved and very significant asset for the Baswich Community, providing space that is in use all year. It gives much needed opportunities for dog-walking, running, cycling, bird watching and walking - the access to the canal towpath enabling much longer rambles.

In summer families use the area for games, kite flying, picnics and blackberry picking. In winter the slopes are wonderful for sledging.

As well as providing much needed space for exercise, the area has a great deal of wildlife, many species of trees and wild flowers - an ideal environment for children to learn about nature.

2

Not to have this recreational green space would be a great loss to the community.

Yours faithfully



local
which
to get to
then those
on which
entirely
that we
usually
all known
and

We intend to submit to be part of all this and be maintained by wonderful views and people. I
mean that the letter goes some ground for looking on these spaces as open and protected.
Yours faithfully
The Wilson-Roberts family

Local Green Space Application

19 August 2018

Stafford Borough Council
Civic Centre
Riverside
Stafford

Dear Sir/Madam,

Please find enclosed with this covering letter a user statement regarding the green space located near Falmouth Avenue in Baswich.

This green space is a vital asset to the community that my family and I personally use on a daily basis for a variety of activities.

I strongly believe that it is imperative that our countryside remains untouched for the good of the physical and mental health and general wellbeing of the children and adults of the local and wider community.

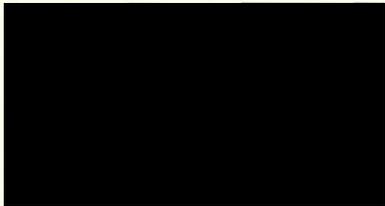
I hope the council agrees with this opinion.

Yours Sincerely,



Kevin Strachan





31-08-18.

Dear Sir,

I am writing to give my support to the Baswick Community group in their quest to maintain the green space on Falmouth Avenue.

I have lived on Falmouth Avenue for 43 years and have seen the open space dwindle from open fields to this one precious piece of land which is used not only by the immediate residents but equally enjoyed by the whole estate and beyond.

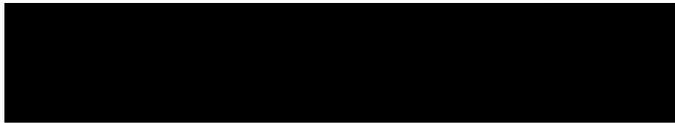
It is abundant with wild life which has already been disrupted by losing the green space when Saxon

fields estate was built.

I feel it is an important area
where people can walk and relax
in a beautiful environment.

Yours faithfully

A large black rectangular redaction box covering the signature area.

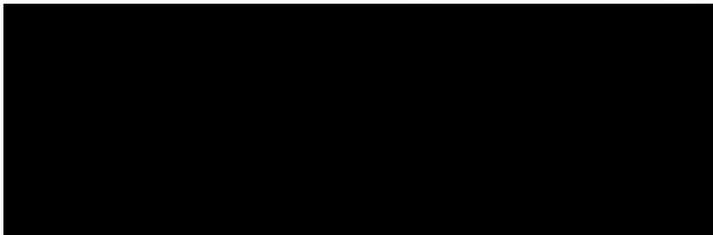


Stefford

22.8.18

I think it's important that
children have access to a
local open space, a good
traffic free area.

IRENE WOOLRICH (MRS)



F.A.O

21.8.18

Stafford Borough Council

I strongly support the proposal that land off Falmouth Ave be designated Local Green Space. I have used it for 26 years, as general recreation, dog walking and in particular my children who are now adults, loved to play there. It provides an outdoor, not overly curated space for youngsters to enjoy and I feel it would be a great loss to the area if given over to housing development.

Laura Channon (Ms)

Subject: CURRENT USERS OF THE LAND OFF FALMOUTH AVENUE

From: [REDACTED]

To: [REDACTED]

Date: Tuesday, August 14, 2018 9:48 AM

Name: Emily Bladon-Selsby

Address: [REDACTED]

1. I have been using the local green space for 6 years
2. I use the local green space 3 times per week
3. I use the local green space for:
Walking with my [REDACTED] baby.

It is so important to us that there is somewhere green within walking distance from our house. We bought in this location for many reasons including access to green space. Without this space we would either have to drive to Cannock Chase or walk in housing estates. With such importance being placed on keeping both adults and children active and healthy this development would certainly make this more difficult for us. I look forward to our daughter being able to run around in this space in the future and hope this isn't taken away from us.

I confirm that all the facts provided in this statement are true.

Signature: [REDACTED]

Date: 14 August 2018

Sent from my iPhone

Subject: Local Green Space off Falmouth Avenue

From: [REDACTED]

To: [REDACTED]

Date: Tuesday, August 14, 2018 4:25 PM

Dear [REDACTED]

Thank you for your recent letter in respect of the local Green Space off Falmouth Avenue and I wanted to e-mail in support of its continued importance as a green space for the local community of Baswich.

From my perspective my wife, Amanda, and I walk our dogs there on a regular basis and it provides a very welcome change from the formalised flatness of the local playing fields or the tarmac of the pathways. We very much appreciate having a genuinely wild area of land which we can explore and which affords us the advantage of wonderful hills and slopes which the dogs adore, and which always invigorates us in our walks. Furthermore we know how important land like this is to young people in order to discover and explore the natural world, and we are also aware that sanitised playing areas do not give people a feel for the natural world in a way that this wonderful space does. We often see rabbits, birds and other wildlife on the slopes when we are on the land, as well as being surrounded by a myriad of plants and abundant beauty, and we greatly enjoy the far reaching and magnificent views from the top of the slopes.

I would therefore wish to lend our voice of support to your campaign to get the land designated as a green space for all the benefits identified above, but chiefly so that we still retain some small vestige of a truly wild area locally which can be enjoyed by all the community for generations to come.

Yours sincerely

Warren Low

[REDACTED]

[REDACTED]

[REDACTED]

Stafford Borough Council
Planning Dept.
Civic Centre
Riverside
Stafford

13 August, 2018

Re : PROTECTED LOCAL GREEN SPACE OFF FALMOUTH AVENUE, STAFFORD

Dear Sir,

My wife and I would like to request that the parcel of land off Falmouth Avenue, Stafford, shown on the attached ordnance survey plan, be designated as Local Green Space in accordance with Policy SB3.

The area concerned is located immediately adjacent to the large built up residential estates of Baswich, Weeping Cross and Saxon Fields, and is readily accessible via several footpaths, hence providing a sustainable green site.

We have both lived in the Baswich/Weeping Cross area for over 50 years and can honestly say that we have continuously used the area of land off Falmouth Avenue for recreation purposes. The land has provided the local residents with an invaluable facility all year round. During winter months when there is snow on the ground, the steep slopes are enjoyed by parents and children, young and old, having tremendous fun sledging in a safe environment. Throughout the whole year the area is also used in numerous ways including childrens play area, bird watching, walking, cycling, jogging/fitness training and dog walking/exercise. There are currently only two designated playing fields in the area, one off Yelverton Avenue and one off Dawlish Avenue, which although both being used are not adequate for the local population they are serving. If this space is lost, it will be lost for ever and that will have a serious detrimental impact on the community.

One of the most important key features of this area of land is it's natural topography and abundance of wild life. The site consists of steeply sloping hills and valleys supporting gorse bushes, long grasses and a variety of trees. This forms the perfect habitat for insects and butterflies which in turn supports a large variety of birds including birds of prey, and bats, and of cause ground dwelling mammals such as rabbits, foxes and badgers etc. Development on any part of this site will inevitably sterilise the entire site which would result in a devastating impact on the local ecology.

The section of land is bounded by Falmouth Avenue to the south, the main Westcoast Rail line to the north and housing to both east and west. The land is therefore considered as local to the community it serves and NOT an extensive tract of land.

For these reasons we urge Stafford Borough Council to seriously consider designating the land as Local Green Space to preserve and safeguard its future indefinitely.

Yours Sincerely



Mr. A. Martin

Mrs. J. Martin

Miss M. A. Smith

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

22nd August 2018

To whom it may concern

Dear Sir/Madam

Re: Local Green Space off Falmouth Avenue

I am writing this letter to support the form I completed relating to the local green space off Falmouth Avenue.

The lovely green land is very precious to the local community. Speaking for myself and my family we have enjoyed taking many walks and picnics there. Weather permitting we walk there daily.

It has been a lovely space to go and take time out and relax and enjoy the scenery, meet fellow walkers and fruit pick – there are lots of lovely blackberry bushes!

There is no infrastructure to support any more housing in the area. The roads are overly busy, the schools are oversubscribed and it is very difficult to get a doctor's appointment at the best of times.

It would be lovely to see that green land remain as it is so future generations can continue to enjoy what we have!

Yours faithfully

[REDACTED]

Miranda Smith

To whom it may concern,

We are writing this to express our concerns about the land off Falmouth Avenue being considered to be Local Green Space. We regularly use this land as a family for walking and also for dog walks at least once a day. This land is the only area nearby where we can do this. It's an area of natural beauty which is enjoyed by so many, including the beautiful wildlife.

We moved to this area 12 months ago and one of the reasons why we liked it so much is because of the perfect land nearby, which we knew we would use so frequently. As a family this enables us to admire its beauty whilst keeping fit and enjoying special family time.

We hope this letter reflects our strong opposing feelings towards the application.

Yours,



Lorraine Duke

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dear Sir/Madam

As a member of the Baswich Community I would like to state why it is important to keep the green state opposite Falmouth Avenue.

I spent my childhood in Falmouth Avenue, where I had great times exploring, looking at the wildlife, watching the rabbits play on the hills, finding bird nests and watching the birds grow and leave the nests. I picked blackberries and made pies. Played hide and seek amongst the bracken and bushes. We had dogs so we were able to take them for long walks, running up and down the hills. It was great when I was young to have this space to explore. During the winter months we used the fields for sledging, which was fantastic fun. This space made me get out of the house and have fun.

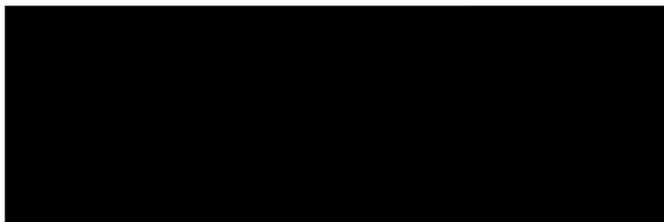
Now I have my own daughter and live on Hillcroft Park, I have continued to use this space educating her in the same way as my father did. We go sledging in the winter, pick blackberries in the summer. When we had a dog, we took him over the fields for a run-about.

This space is invaluable, it brings families together to develop special memories that you never forget.

It is said that obesity is high in our country, so why take a space that encourages outside activity and special family times together.

Yours Faithfully

L Duke



Patricia Howfield, [REDACTED]

LOCAL GREEN SPACE – OFF FALMOUTH AVENUE

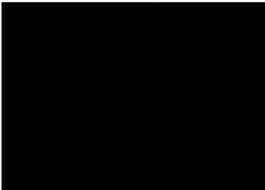
I have walked in this green space since moving into Torrington Avenue in 1969. My children learned about nature here and perhaps influenced by their childhood one studied Environmental Science and the other works at Yorkshire Sculpture Park promoting well-being through art and nature. In the 70's I remember children being taken out as a class to walk and learn about nature here.

At the age of [REDACTED] I still walk in this space every day enjoying bird watching. I have seen foxes, muntjac deer, hares squirrels and lots of rabbits. As well as enjoying the abundant wild flowers.

As well as the proven health benefits of being in nature the social benefit of this piece of land on the local community is invaluable. For many old people walking here with their dog is the only time they see and talk to others, meeting families and children out fruit picking in the summer and in winter enjoying the sight of families having fun in the snow sledging. Or just having a regular chat with other dog walkers. It is a route home for some children from Walton School and it provides somewhere safe outdoors for children to play. It provides a route to Cannock Chase for the fitter walker avoiding the use of vehicles and roads. The space is also used by people who would otherwise go to Cannock Chase increasing pressure on an area designated as of outstanding natural beauty. By preserving this space we also reduce footfall on Cannock Chase.

In this day and age when the Government is highlighting the need for physical exercise for old and young and the benefits of walking in nature for mind and body, we should all be working to protect our own bit of local wilderness.

[REDACTED] 15th August 2018.



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

14th August 2018

Dear Sirs,

Local Green Space – off Falmouth Avenue

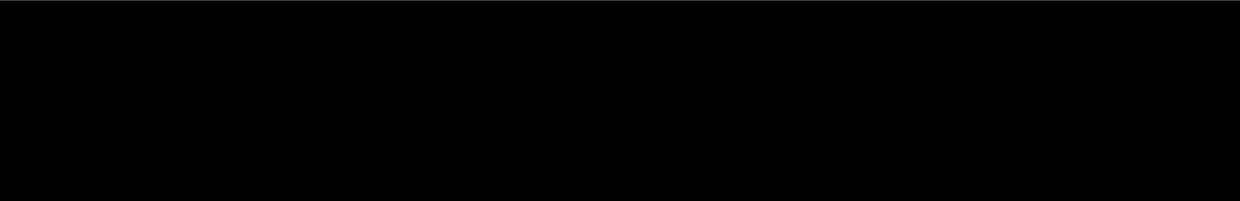
Back in 2014 we wrote to object about the potential development of the green space off Falmouth Avenue.

Four years on our position has not changed and we support the Falmouth Action Group in their efforts to have the area designated as Local Green Space.

Further housing on this area would create even more congestion on the surrounding roads. There would be significant increases to the waiting times for appointments at Weeping Cross surgery – most patients already have to wait three weeks or more, so an increase in patient numbers would undoubtedly extend this waiting time. And as the local schools are already operating near full capacity, where would the extra children be educated ?

The open space off Falmouth Avenue is widely used by the local community for many different activities, all of which contribute to the health and welfare of those who use the area. Our personal use of the open space may be limited to walking as part of various routes around the Baswich/Weeping Cross area and through to/from the canal, plus bird-watching while doing so, but we believe that this is an area of greenery in the town that must be retained.

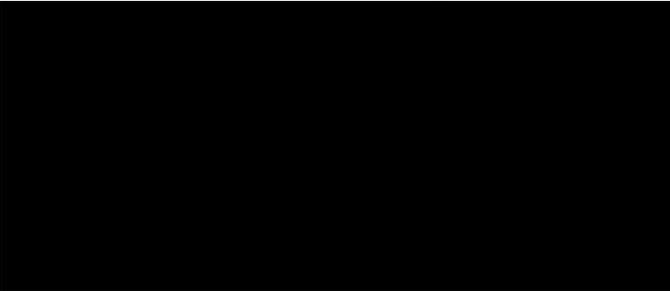
Yours faithfully,



Richard Wilkes

Fiona Wilkes

cc: Falmouth Action Group



6TH September 2018.

To Whom it concerns,

We have only very recently moved into the area and fell upon this 'Green Space' when out exploring with our dogs on a walk.

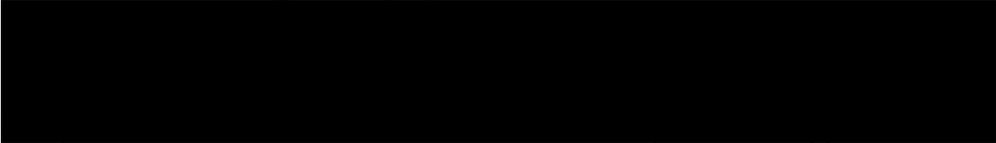
What a great space, superbly clean, well cared for and other people enjoying it too.

We whole heartedly support the concept of keeping green spaces in residential areas.

Local green spaces accessible to all generations from children to the elderly are crucial for the maintenance of health, whether it be of mind, spirit, general mentality, or physicality, and communication with other human beings and nature.

We support your application and look forward to hearing of a successful outcome to retaining this area as an open green space.

Yours faithfully,



P.S. We intend using the space regularly to walk our dogs, and a chance to walk off the street into a green area.

Subject: Falmouth Action Group

From: [REDACTED]

To: [REDACTED]

Date: Wednesday, September 5, 2018 9:12 PM

Hello,

I just wanted to expand a little on my family's use of 'Rabbit Hill', Falmouth Avenue over the years we have lived here. We have dropped in the filled in letter to [REDACTED]

[REDACTED]

As a family we have used the space over the last 15 years regularly for walks and fresh air. Whether it has been all of us, just me and the toddlers or even sometimes just me. Although Stafford is on the edge of some beautiful countryside we are such a commuter town that we regularly drive out of our estate, straight into the office or the city and then drive straight back home again. The open space on Rabbit Hill is the only wide open space you can actually *walk* to and breathe a bit of air, especially if work is stressful. In those times, over the years, I have often walked just to get some exercise and clear my head.

Anyway, I wish you all the very best in the campaign to save a little bit of greenery for our corner of Stafford.

Regards,

John Wilson

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

In support of the application for Local Green Space Falmouth Avenue

We have lived in Falmouth Avenue for 26 years and during that time have regularly used the green space for walks. It is a welcome natural area in an estate that has no other such space and it means that it is not necessary to drive somewhere in order to walk in pleasant surroundings rather than just walking round the streets.

The area is full of wildlife and is very well used by all ages. When my grandchildren visit usually one of the first things they ask to do is to go over the field to look for rabbits and birds and they love to explore up and down the hills and pick fruit when in season. In a time when more and more houses are being built in the area it is essential to maintain somewhere that is still "wild" as many studies say that exercising in such an environment is beneficial for both mental and physical wellbeing.

Yours sincerely

[REDACTED]

S.M.Evans

From: roger bedson [REDACTED]
Sent: 21 September 2018 13:41
To: forwardplanningconsultations
Subject: Land at Great Haywood.
Attachments: DOC210918-21092018124200.pdf

Dear Sir / Madam,

Please find attached consultation response re the above.

Many thanks

Roger Bedson BSc MRICS FAAV.
RICS Registered Valuer

for Hinson Parry & Company
Chartered Surveyors, Valuers, Auctioneers & Estate Agents

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]



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Forward Planning
Civic Centre
Riverside
Stafford
ST16 3AQ

18 September 2018

Dear Madam / Sir,

New Stafford Borough Local Plan Consultation Response

This letter has been prepared on behalf of Nicholas Bostock who owns an area of land off Main Road in Great Haywood, in response to the current consultation on the new Stafford Borough Local Plan.

Initially, we would welcome the proactive steps the council is taking to replace the local plan before the expiry of the current version. That is the best way to ensure that growth continues to be delivered in a planned way.

The rest of this letter sets our responses to the specific issues raised in the two consultation documents – the “Scoping the Issues Report” and the “Settlement Assessment” – as well as providing initial details on our client’s site.

Scoping the Issues Report

Q2. *What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?*

We would encourage the use of the plan to support and promote economic growth, and to maximise the opportunities provided by HS2. That can be achieved through taking advantage of the borough’s existing economic base and allocating further sites to support additional growth.

As national planning policy recognises, a critical part of that equation is delivering enough homes to support economic growth aspirations. While the new standard method establishes a baseline below which housing delivery should not fall, the National Planning Policy Framework (‘NPPF’) (2018) is clear that housing targets above that *de minimis* figure will be supported where they are proposed.

Delivering enough homes is also a critical factor in delivering social sustainability, and can improve environmental sustainability by reducing commuting distances and enhancing biodiversity.

Chartered Surveyors, Valuers, Auctioneers & Estate Agents



Q5. *Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?*

Density targets can be helpful as a guide and to encourage the efficient use of land. However care should be taken in how they are worded. For example, to encourage high quality design that is sensitive to the characteristics of the surrounding area, flexibility to vary from the targets would need to be provided.

Q6. *National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?*

National policy does not state that brownfield development should be “prioritised.” Instead, paragraph 117 of the NPPF (2018) states that plans should seek to meet objectively assessed need in a way that “*makes as much use as possible of previously-developed or ‘brownfield’ land.*” That is distinct from saying that brownfield sites should be developed first, or as a priority.

When identifying brownfield sites for development, care should be taken to ensure that they are deliverable and – in particular – that their development is viable. While there are obvious sustainability benefits to redeveloping brownfield sites that is just one factor to be taken into account - consideration should also be given as to whether alternative sites would lead to a more sustainable pattern of development “in the round.”

Where there are not enough brownfield sites to meet development needs then, in accordance with national policy, the council should look to identify greenfield sites for development in order to meet housing need. Sites in the open countryside should be prioritised over those in the Green Belt.

Q7. *National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?*

The need for different types of housing should be established through empirical research which is published for consultation. Notwithstanding the outcome of any such consultation, adequate flexibility needs to be incorporated into planning policies to allow developers to reflect market demand in their housing schemes and to quickly respond to market signals.

Q8. *The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?*

Self-build homes can be an important constituent of housing supply and should be encouraged in line with the level of need demonstrated by the council. The percentage of

dwellings to be made available and the site size threshold should be established based on that assessment of need for self-build plots.

To ensure that sites can be viably delivered, we would recommend that a “cascade” mechanism is included in any policy that allows the developer to construct the plot themselves if it has not been sold in a pre-defined period (say, 12 months). To ensure continuity of build, that would suggest a minimum site size threshold for this requirement of at least 70 dwellings (so around two years production).

Q10. What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?

Since the Barker Review in 2004, it has been clear that the absence of an adequate supply of homes can impact economic growth.

The government’s standard method for determining housing targets produces a minimum figure which does not take any account of economic growth aspirations. Care should therefore be taken to ensure the housing target is sufficient to support and facilitate the borough’s economic growth aspirations – and to take advantage of the vast economic opportunity offered by HS2.

The NPPF (2018) is clear that higher housing targets will be supported where councils propose them.

Q29. The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?

Paragraph 137 of the NPPF (2018) sets out clear criteria for when a Green Belt review may be necessary. To determine whether such a review is required, the council should work through those steps and publish their conclusions for consultation.

Settlement Assessment – July 2018

We generally support the methodology used in the Settlement Assessment paper, as well as the resultant findings. It appears to accurately reflect the current characteristics of settlements within the borough.

Notwithstanding that, when deciding how much development to allocate to each settlement, consideration should be given to how new development can improve sustainability – either through the provision of new services and facilities or ensuring that existing ones remain viable.

Land at Main Road, Great Haywood

We believe that our client’s site in Great Haywood, edged in red on the enclosed plan, represents a suitable opportunity to deliver some of the additional growth that will be needed across the plan period.

Great Haywood is recognised to be a sustainable settlement with the ability to accommodate further growth. The route of HS2 to the north provides a sensible northern boundary to the village, while there are no known technical constraints which would prevent development.

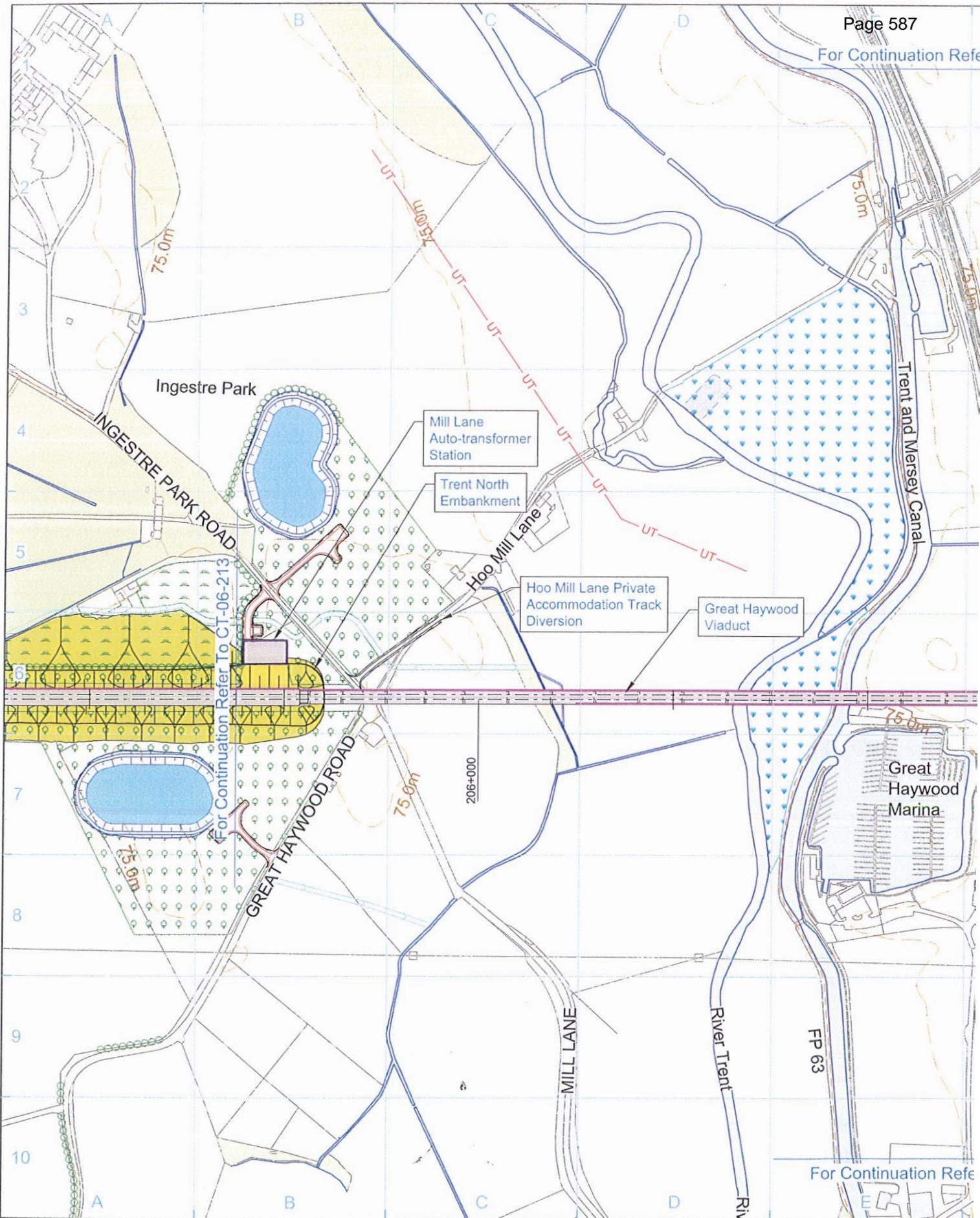
Further details about the site's suitability for development will be provided in due course.

Please do not hesitate to contact me if you would like to discuss the contents of this letters in more detail.

Yours faithfully



C R Bedson BSc MRICS FAAV
RICS Registered Valuer
Hinson Parry & Company



Legend			
	Depot, station, headhouse or portal building		Replacement floodplain storage
	Tunnel portal		Woodland habitat creation
	Electricity substation		Wetland habitat creation
	Land drainage area		Grassland habitat creation
	Ecological mitigation pond		Landscape mitigation planting (scrub / woodland)
	Balancing pond		Grassed areas
			Sustainable placement
	Public realm/Replacement community facility		Engineering earthworks
	Engineering earthworks		Landscape earthworks
	Rail alignment formation		Returned to suitable development use
	County boundary		Borough / District boundary
	Borough / District boundary		Tunnels external extent
	Community Area boundary		Watercourse diversion
	Watercourse diversion		Existing watercourse
	Existing watercourse		Ditches - new
	Ditches - new		Hedgerow habitat creation
	Main utility works		Existing public right of way (PRoW)
	Existing public right of way (PRoW)		New, diverted or realigned PRoW
	New, diverted or realigned PRoW		Stopped-up PRoW
	Stopped-up PRoW		Tunnels external extent

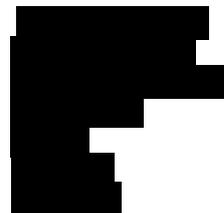
Date: 28 September 2018
Our ref: 253184
Your ref: N/a



Stafford Borough Council

For attention of [REDACTED]

BY EMAIL ONLY



T 0300 060 3900

Dear [REDACTED]

Planning consultation: Stafford Borough local plan review – Scoping the issues consultation

Thank you for your consultation on the above and for allowing us extra time to respond.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Although we cannot answer all of the questions posed in the consultation we offer the following comments setting out our thoughts on those aspects of the review within our remit:

Questions 1&2 – What should the borough be like and what key outcomes should the local plan deliver?

The revised NPPF provides a platform for a range of local plan policy measures dealing with the natural environment and the positive interrelationship with human health and the economy. Key changes to the NPPF which we anticipate working with the Council to explore further and deliver, as appropriate, include:

- strengthened policies on biodiversity net gain and encouraging opportunities to achieve net environmental gains
- the treatment of green infrastructure as a strategic policy area
- stronger protection for ancient woodland, ancient and veteran trees
- the scale and extent of development within National Parks and AONBs should be limited

Question3 – a better place to live

A range of data is available that may help with this question. The Cannock chase SAC partnership work on the repeat visitor survey of the SAC this year may yield valuable information from visitors with a Stafford borough post code. Similarly Natural England's Monitoring Engagement with the Natural Environment (MENE) dataset may offer useful data for consideration¹. These, together with the Council's existing green infrastructure related information (adopted local plan policy and supporting text/evidence) may form a valuable foundation on which to consider responses to this question from local residents and businesses.

¹ MENE - <https://www.gov.uk/government/collections/monitor-of-engagement-with-the-natural-environment-survey-purpose-and-results>

Question 4 Supporting local villages and their communities

We note that the revised NPPF's changes to local plan making encourage Neighbourhood Development Plans to include allocation of land for new house building. Natural England would welcome further dialogue with the Council to understand how this might work in practice.

Question 5 Density of development and locations

A strategic approach to green and blue infrastructure offers a valuable opportunity to ensure that decisions over development density work effectively in delivering multi functional green infrastructure. For example established research and practice in relation to green infrastructure (ref Biodiversity by Design) suggest that higher density development can be designed to incorporate high quality green and blue infrastructure resources.

Question 6 Housing & employment sites other than brownfield sites

Natural England will continue to work with the Council on the sustainability appraisal aspects of the new local plan for those themes and issues within our remit.

Questions 7 -15

No comments

Question 16 – Sport and leisure facilities

This question potentially touches on the role of green and blue infrastructure as multi-functional networks of green and blue space including open spaces for sport and leisure. The NPPF emphasises the strategic role and importance of green and blue infrastructure and we anticipate working with the Council to explore options to deliver an effective green and blue infrastructure resource for the borough accordingly.

Question 17 Local green spaces

Natural England's access to evidence publications catalogue is likely to provide references to help evidence the value of spaces suggested by those responding to this consultation.

Themes such as 'use and enjoyment of the natural environment' may provide valuable information;

<http://publications.naturalengland.org.uk/category/61004>

Question 18 – location of new educational facilities

The data from the ongoing Cannock Chase SAC visitor survey may provide useful information to inform choices over the need and demand for educational provision in relation to the role of this important semi-natural habitat and landscape resource for tourism and recreation.

Question 19 - Health, social and community facilities

We refer the Council to our 'use and enjoyment of the natural environment' link (See Q17 above) as important context for consideration of where such facilities might be located.

Question 20 – Pollution and air quality

Natural England looks forward to working with the Council to forge shared understanding of the evidence base relating to air quality and the scope for measures to address poor air quality and its effects through the revised NPPF.

Question 21 - 23 Sustainable transport choices

No comments

Question 24 Transportation projects

We refer the Council to our response to Q20.

Questions 25 & 26 High quality design, closer ties with the design board and heritage

No comment

Questions 27 AONB, 28 Natural Assets and 30 Climate change and renewable technologies

Natural England looks forward to working with the Council on relevant policy aspects of the local plan review taking account of the opportunities presented by means of the revised NPPF.

Question 29 – Green belt

No comment

Question 31 - Other issues

Strategic and cross boundary issues:

NB Air quality – Wealden judgement and assessment of ‘in combination’ effects.

Consideration will need to involve dialogue with neighbouring LPAs in respect of plans and projects which in combination may have significant effects on European Sites in the area. Scope may exist to explore the need for and application of Shared Nitrogen Action Plans (SNAPs). Atmospheric nitrogen ‘theme plan’ link:

<https://www.google.com/url?q=http://publications.naturalengland.org.uk/file/5688662740172800&sa=U&ved=0ahUKEwicxaP4tsvbAhUBkCwKHb9BCnkQFggGMAE&client=internal-uds-cse&cx=016466427749889765075:9dnxorwiphg&usq=AOvVaw3BivBMiut8UxMTdJ8r8DcP>

For any queries relating to the specific advice in this letter only please contact me on [REDACTED]

For any new consultations, or to provide further information on this consultation please send your correspondence to [REDACTED]

Yours sincerely

Antony Muller

Lead Adviser – West Midlands Planning for a Better Environment Team

Stafford Borough Council

New Local Plan

Scoping the Issues Report

Hopton and Coton Parish Council have considered the report and reply as follows:

Question	Hopton and Coton Parish Council reply
<p>Question 1 What would you like the Borough to be like in the future?</p>	<p>The Council would like the Borough to have a similar mix of housing and industrial estates as at present. Any new development should be matched equally with infrastructure to support it. The Borough should preserve a high quality countryside, e.g. with high biodiversity.</p>
<p>Question 2 What do you think should be the key economic, housing, environmental, social, community and health outcomes that the Local Plan should help to deliver?</p>	<p>The Local Plan should deliver quality and sustainability to meet local needs and the local environment, while paying greater head to local concerns.</p>
<p>Question 3 Policies in the Local Plan can seem very high level but at their heart they are all about creating better places to live, work and play. What would you change in your local neighbourhood to make it a better place to live?</p>	<p>We have a very poor bus service in Hopton. For example, no local resident can get to the doctor's using public transport.</p>
<p>Question 4 How could the new Local Plan support local villages and their communities to grow and thrive?</p>	<p>There is a request that planning officers do site visits as soon as a planning application comes in. Villages do not want to grow – we want the villages to stay the same but with improvements. There should be an insistence that the Planning Department is expanded to cope with the current level of demand.</p>
<p>Question 5 Do you consider that the new Local Plan should set out a range of densities for the Borough and if so, are there any specific locations?</p>	<p>Stafford Borough Council looks at figures rather than people and areas and this means that builders and developers are completely out of touch with local residents.</p>

<p>Question 6 National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing. What should the Council look to do if it cannot find enough suitable brownfield sites to meet its housing and employment needs?</p>	<p>The Borough Council should look more closely at people who want to build small infill developments</p>
<p>Question 7 National policy encourages Local Plans to plan positively for a mix of housing, based on the demographic of people that live in the Borough both now, and the expected future population. What types of housing do you think will be most needed in the Borough over the coming years?</p>	<p>There will be most need for affordable housing, single occupancy dwellings and homes for the elderly. These types of housing should be encouraged over the coming years. There should be proper enforcement of the required proportion of these types of property and developers should not be allowed to avoid this commitment by the use of various devices.</p>
<p>Question 8 The new Local Plan could seek that a percentage of large sites (e.g. over 20 dwellings or more) should be made available for self-build. What are your thoughts on this, and if you are supportive, what percentage should be made available for dwelling plots?</p>	<p>Self-build projects have produced some good developments. Why put a number on it? We need to think about the price of land and we need more regulation in this sector.</p>
<p>Question 9 National policy states that the Council should prioritise the development of redundant brownfield sites that have good access to existing services for new housing which includes pitches for gypsies, travellers and travelling show people.</p>	<p>The same criteria should apply to gypsies and travellers as to any other group of people.</p>

<p>Where should the Council look for suitable brownfield sites for new pitches?</p>	
<p>Question 10 What are the main barriers to growth that need to be addressed in the Local Plan to ensure that all sections of the community have access to the benefits of future employment creation in the Borough?</p>	<p>A major barrier to growth is road construction / infrastructure. Without this, no-one will be able to get to their place of work</p>
<p>Question 11 Do you think there is a need to identify additional land for employment and if so what types of employment uses should the Local Plan support and promote?</p>	<p>We need to look at what employment we have in the borough and what types of employment the borough needs. When this decision has been made, SBC can start looking for suitable land.</p>
<p>Question 12 What do you think are the key challenges facing the Borough's town, village, and neighbourhood centres and how can the Local Plan maintain and enhance their role?</p>	<p>Hopton Parish Council would like to emphasise that originally SBC planned a route between Beaconside, the Cannock road and the motorway – this never came to fruition. Not enough resources are devoted to the road network. Only new housing seems to be a priority. Stafford's role could be enhanced by reducing parking fees and the business tax. If SBC were to do this, more people would visit the town and set up businesses there. In that way, more money would be coming into the town.</p>
<p>Question 13 What improvements would you like to see in those centres that you visit regularly? Should additional uses be supported other than retail such as residential, entertainment and restaurants? Please state the name of the centre in your response.</p>	<p>Stafford. Some areas are now looking quite dilapidated. There should be an entertainment "hub" with restaurants, a cinema and a theatre. No-one goes into Stafford for entertainment at the moment. Parking fees could be changed – for example, there could be free parking after 4.00 / 6.00 p.m. and there should be free parking around the Guildhall.</p>
<p>Question 14 What are the best locations for new retail and leisure development in the Borough and how can future</p>	<p>Do we need any more retail parks outside the town? We need the town centre to be refurbished. Get the Eastern by-pass sorted now and start planning for the Western by-pass.</p>

<p>development be harnessed to support the delivery of wider regeneration and economic growth needs and objectives?</p>	
<p>Question 15 Is there a need for the development of retail, leisure and other town centres uses in locations outside the existing established retail centres, and if so, where?</p>	<p>There is no need for further retail development outside established retail centres which should be refurbished.</p>
<p>Question 16 What new sport and leisure facilities do you think are needed in the Borough to support existing and new communities?</p>	<p>Sport centres don't pay.</p>
<p>Question 17 National policy gives councils new powers to protect valued open spaces by designating them as Local Green Spaces. Are there any open spaces that are special to your local community which should be designated? If yes, please provide details of the open space, its location and the reason why it is special to you and your community.</p>	<p>There should be no increase in the designated Green Spaces that Hopton already has.</p>
<p>Question 18 What new educational facilities do you think are needed, and where in the Borough are these required to support existing and new communities?</p>	<p>Apparently, schools are already planned for the Maximus development.</p>
<p>Question 19 19a What new health, social and community facilities do you think are needed in the Borough to</p>	<p>Perhaps the Maximus development which is planned for the Hopton area should have a new surgery. Wherever this is placed, there should be a decent infrastructure so that people can get to it.</p>

support both new and existing communities? 19 b) Where should these be located/go?	
Question 20 What approach could the Local Plan take to ensure that issues relating to pollution and air quality are minimised?	Get rid of traffic lights because it has been proved that a lot of air pollution is caused by cars waiting at traffic lights – have lots of mini-roundabouts instead.
Question 21 There is a growing need to deliver the infrastructure required to support sustainable transport choices. What could the Plan do to help you make more sustainable transport choices?	Many of the bus routes are fragmented at the moment. There should be one major bus route taking in many of the villages and going through Stafford and to the hospital. The Local Plan should promote the reinstatement of bus services to all the borough. The Borough Council should be dedicated to maintaining proper bus services in remote areas (even if this is uneconomic).
Question 22 Are there any specific sustainable transport projects that the Council should be promoting as part of the Local Plan? If yes, please provide some detail about the project.	See answer to question 21.
Question 23 What economic development opportunities do you consider could arise from HS2 for the Borough?	There are no opportunities from HS2 in the Borough.
Question 24 Are there any specific transportation projects that the Council should be promoting in the Local Plan? If yes, please provide some detail on the project, its location and the reason why you believe it is necessary.	Please see previous answers.
Question 25 National policy reinforces good design as a key aspect of sustainable	Yes there should be closer ties with the local design panel. The Local Plan should encourage respect for the Local Green Infrastructure Plan and for the Local Design Plan.

<p>development and provides support to ensure high standards of design generally. Should closer ties with the local design panel be established to provide assessment and support for major or particularly complex or sensitive development proposals?</p>	
<p>Question 26 What could the Plan do to protect and enhance the Borough's Heritage Assets?</p>	n/a
<p>Question 27 What approach should the Local Plan take to ensure that Borough's landscape, AONB and its key features are protected and enhanced?</p>	.
<p>Question 28 What approach should the Local Plan take to ensure that Borough's natural assets are protected and where possible enhanced?</p>	
<p>Question 29 The NPPF states that Green Belt boundaries should only be reviewed in exceptional circumstances through the preparation of the Local Plan. Less than a quarter of the Borough is covered by Green Belt. Do you consider review is necessary?</p>	Review is always required even if to confirm that the status quo should be maintained.
<p>Question 30 Which renewable technologies do you think are most suitable for development in the Borough? Please provide additional information as to</p>	Water power and ground source power.

why you deem these to be suitable.	
Question 31 This document sets out the issues that need to be addressed through the new Local Plan. There may be matters that have been missed or that are not covered by the other consultation questions. Are there any matters you think also need to be considered at this stage and why?	No.