



Local Plan 2020-2040

Scoping the Issues Consultation

Summary Report

Consultation period:

18 July 2018 - 18 September 2018

1. Introduction

- 1.1 Stafford Borough's current adopted plan is made up of two documents; the Plan for Stafford Borough 2011-2031 (adopted in June 2014), and the Plan for Stafford Borough 2011-2031: Part 2 (adopted in January 2017). In July 2017, the Council commenced work on the Local Plan 2020-2040, which when adopted will replace these two documents.
- 1.2 The first stage of public consultation for the Local Plan 2020-2040 was the Scoping the Issues consultation which took place between 18 July and 18 September 2018.
- 1.3 This report provides a summary of the representations received to this consultation.

2. Consultation Responses

- 2.1 There were a total of 67 responses which have been published in full alongside this summary report. The responses were received from statutory bodies, stakeholders, agents / developers, landowners and the general public.
- 2.2 The Council advised that responses should be submitted using the consultation form available on the Council's website, however, responses were also accepted via email or letter.
- 2.3 Each of the responses submitted have been read by Officers in the Strategic Planning team, and the responses have been assigned by respondent against each of the questions for detailed analysis. This report is supported by an appendix which shows the specific responses to each question.
- 2.4 In the case where comments did not match a specific question these have been collated into the general responses section.
- 2.5 The consultation asked a total of 31 questions. The full consultation document is available to view on the Council's website ([New Local Plan: Scoping the Issues - Consultation | Stafford Borough Council \(staffordbc.gov.uk\)](https://www.staffordbc.gov.uk/new-local-plan-scoping-the-issues-consultation)).
- 2.6 The following section provides the number of responses and a summary of key points raised in these responses per question.

3. Summary of Responses

3.1 Question 1

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

There was a total of 14 responses to this question.

Key points raised

- 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.
- 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.
- 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 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.
- A good place for children to grow up with improvements to sports facilities and revive community young people's clubs where they do not exist.
- The Plan should seek to protect the facilities that are valued by local people, and promote new and enhanced facilities where needed.
- A place which tackles loneliness, in particular among older people.
- More bungalows built for older people downsizing, with good public transport to town and local hospitals.
- A Borough which values physical and mental health, and places emphasis on prevention as well as cure.
- Improved accessibility and provision for pedestrians, disabled, elderly and tourists.
- Any new development should be matched equally with infrastructure to support it.
- More independent retailers, attract entrepreneurs and high-skilled staff.
- Ensure the regeneration of the north end of Stafford town centre to ensure it is more vibrant with occupation of empty properties.
- Strong rural communities.
- The Borough should respect the existing adopted Neighbourhood Plans.

- The heritage of the area is well understood and there is a positive strategy for the conservation and enhancement of the historic environment.
- The Plan's vision and objectives should make reference to the strength of the area's cultural offer.
- Aspire to better quality in terms of architectural design and landscaping.
- The Borough should preserve a high-quality countryside, e.g. with high biodiversity.
- Staffordshire Wildlife Trust would like to see the Borough lead on green infrastructure and biodiversity enhancement, delivering measurable outcomes and enhancing the green resources of the area.
- 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.
- Introduction of Green Belt between Stafford and Stone, and possibly elsewhere to mark clear limits to development.

3.2 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?

There was a total of 29 responses to this question.

Key points raised

- High speed broadband and mobile phone coverage.
- Deliver attractive, high-quality, individual, sustainable, lifetime homes that people of all ages desire, and to accommodate the aging population or disabled for longer in their own homes.
- The Plan 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.
- Recognise that rural villages outside the Key Service Villages need to grow in order to maintain community.
- 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.

- The emerging Local Plan and policies for the supply of housing and those relevant to settlement boundaries should be prepared flexibly, with suitable wording to ensure that these can be amended to reflect changing housing needs throughout the plan period, with a specific rolling review mechanism at least every 5 years.
- The new Local Plan should aspire to deliver housing and economic growth levels above the 'minimum' requirement identified through the standard method.
- 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.
- Ensure employment / retail areas and support services are easily accessible from residential areas, which may include the provision of good public transport links.
- The new Local Plan should help create the conditions in which businesses can invest, expand, adapt and address barriers to investment such as poor infrastructure, services, housing or areas of poor environmental standards.
- There is no mention of the historic environment in the associated text. The conservation and enhancement of the historic environment should be identified as a key outcome.
- The Plan seeks to protect facilities that are valued and should consider 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.
- The return of the 24 hour Accident and Emergency function at the County Hospital.
- The Borough needs to leverage its north and south transport connections and make significant improvement to its east and west transport connections.
- Encourage the use of the plan to support and promote economic growth, and to maximise the opportunities provided by HS2.
- Farming should be encouraged.
- The Local Plan should deliver a net gain for biodiversity.
- The plan should seek to protect and enhance valued landscapes and recognise the intrinsic character and beauty of the countryside. Great weight should be given to conserving and enhancing the landscape, and scenic beauty in Cannock Chase Area of Outstanding Natural Beauty (AONB).
- All land of high nature conservation value to be identified and appropriately designated.

- 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.

3.3 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?

There was a total of 16 responses to this question.

Key points raised

- A reduction in Heavy Goods Vehicles (HGV) thoroughfare through Eccleshall.
- Increased provision of bus services.
- Increased infrastructure provision to support a growing population.
- An eastern distributor road for Stafford Town.
- A more centralised shopping area in Stafford town centre.
- More consideration should be given to those who have retired and look for a safe and tranquil community in which to live.
- Greater co-operation / investment in the local infrastructure (e.g. sewerage), with real accountability on local problems such as flooding and relevant bus services.
- Greater engagement with local people, businesses and agriculture.
- The status of Eccleshall should be elevated so it is recognised as a town rather than a village.
- All residents should be able to reach an area of natural greenspace, which could reduce impacts on the Cannock Chase Special Area of Conservation (SAC).
- Sustainable drainage features should be retrofitted in problem 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.
- Better access for walking and cycling along green routes in urban areas.
- Better protection and enhancement of Local Wildlife Sites through the planning system.

- The Local Plan should allocate sufficient land to redress the imbalance between the insufficiency of homes versus the high level of employment provision in the vicinity of Cold Meece.
- The Council prepares 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.

3.4 Question 4

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

There was a total of 27 responses to this question.

Key points raised

- 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.
- Local villages have more say over development, provided that a certain sustainable amount of development is accepted. More input from local villages into the design and quality of housing built.
- It is important that the Council's proposed housing distribution re-consider 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.
- Most villages would cope well and welcome gradual growth. Villages need starter homes and bungalows.
- 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.
- Suggestion that the Plan contains a strong policy covering community, cultural and social facilities so protecting facilities from unnecessary loss. This should include facilities such as community halls and public houses.

- Recommend looking to involve Housing Associations in setting a local definition of affordable housing that will encourage delivery of all affordable housing types. The preference for early engagement with local Housing Associations should be emphasised in the Plan policies.
- Infrastructure needs to be considered proactively ahead of planning development, and specifically expansion of local health service provision to support a growing and ageing population.
- Better transport links.
- 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.
- Support should be given to maintain the current bus services and promote mobile services (e.g. libraries), and outreach services (e.g. GP clinics, post offices).
- 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.

3.5 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?

There was a total of 27 responses to this question.

Key points raised

- Minimum densities can cause problems in terms of viability for registered providers of affordable housing.
- If minimum densities are set to be applied within the area, then any optional space standard should be applied across all tenures, 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.
- 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.

- A flexible range of densities, with the ability to deviate from these where specific circumstances dictate, is more aligned to the provisions of the National Planning Policy Framework (NPPF).
- 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 Section 106 or Community Infrastructure Levy (CIL) monies could be used to help fund enhanced services, to support higher density living.
- 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 the Borough would be inappropriate and unlikely to provide a variety of typologies to meet the housing needs of different groups.
- 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.
- 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.
- 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.
- 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.
- The densest land uses should still have a minimum amount of green space and green networks within them, so this standard should also be set. Densities should seek to protect and enhance key ecological sites.

- The historic environment should be carefully considered at an early stage with respect to considerations for sites and densities.
- A strategic approach to green and blue infrastructure offers a valuable opportunity to ensure that decisions over development density work is effective in delivering multi-functional green infrastructure.
- A blanket approach to a minimum density across the Borough would be inappropriate and unlikely 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, viability and overall character and setting should be carefully considered at the planning stage of the development.
- Any standard should be set out 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.

3.6 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 was a total of 27 responses to this question.

Key points raised

- 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.
- The Borough Council should provide incentives for developers to use brown field sites, where presently the cost is too prohibitive to clean up and use the site.
- 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.

- The allocation of the Cold Meece site as a 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.
- If the Council cannot find sufficient Previously Developed Land sites to meet the need for housing and employment requirements, then it should firstly consider sites that contain a mix of brownfield and greenfield land before considering sites that are entirely greenfield.
- 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 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.
- 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.
- 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.
- There are plenty of infill sites which are outside Key Service Villages and not in Green Belt. 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.
- 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.
- 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.
- A number of developers promoted greenfield sites arguing that a site can still be sustainable even if it's greenfield as 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.

3.7 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 was a total of 24 responses to this question.

Key points raised

- Provision of bungalows and smaller houses that can be bought for people wishing to downsize.
- Small starter homes 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.
- 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.
- 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.
- The Council should assess the level of specialist older persons' affordable housing needs to inform policy. The evidence should be translated to a separate policy, fully representing the need for specialist housing and care for older people in Stafford Borough.
- The preparation and review of housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned. 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.
- A specific housing mix should not be specified in any Local Plan policy, which only presents a 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.
- 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.
- 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.

- Having rigid 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.
- The Borough should insist on a high quality of design and not simply accept the very limited range of designs which developers often propose.
- 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 afterwards.
- 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.

3.8 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?

There was a total of 20 responses to this question.

Key points raised

- Why restrict self-builders to plots or large development sites and not encourage self-build on infill plots?
- Self-build projects have produced some good developments. Why put a number on it? The price of land needs considering and more regulation in this sector.
- 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 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.
- The Council should 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.

- Objections to this proposal made reference to there being 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.
- Challenges exist with the provision of self-build sites within larger sites. These include consistency of design, timescale of construction, site safety and access, and the economic viability of the sale of individual plots within a larger development.
- 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.
- To ensure that sites can be viably delivered, it was recommended 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).
- Suggestion of 1% on new developments comprising over 100 dwellings, if necessary. However, it was stated as being difficult to see how this will work, for instance, the consistency in styles could be variable.
- 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 be allowed to overcharge for the land.
- 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 being provided to be from self-build projects.
- 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.
- 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.
- A 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.

- 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 and North East Somerset Place-making Plan and Derbyshire Dales Local Plan.

3.9 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?

There was a total of 5 responses to this question.

Key points raised

- Surely the council already knows where the brownfield sites are?
- 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.
- The same criteria should apply to gypsies and travellers as to any other group of people.
- 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.

3.10 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?

There was a total of 14 responses to this question.

Key points raised

- High-speed fibre broadband and mobile phone coverage.

- Parking at the station and in Eccleshall.
- Business rates have killed the high streets in Stafford and Stone.
- Key to provide better transport networks through the Borough to allow resident access to opportunities.
- Lack of affordable, regular transport in the area.
- Creating an increased focus to providing new residential and employment development within the rural areas (in locations that are or can be made sustainable).
- 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.
- Access to employment.
- All developments should have the needs of pedestrians, cyclists and wheelchair users as a priority – not just as a consideration.
- All developments should be required to contribute to a public transport fund used to fund services such as community transport.
- Road construction / infrastructure.

3.11 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?

There was a total of 16 responses to this question.

Key points raised

- 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.
- Need 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.
- Welcome more employment, 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.
- Agriculture / farming should be supported, and wildlife, craft, and historical attractions for visitors.
- The availability of land for employment is sufficient in Staffordshire.
- It is crucial that additional land is allocated for employment uses. Sites should be located in accessible and well serviced locations.

- One area for potential growth is expansion of new high-technology areas such as that in creative industries and ensuring clean growth and encouraging new sectors to the Borough.
- The Borough should resist any further developments for storage / distribution unless these are an essential part of other activities on the same or nearby sites such as manufacturing or Research and Development (R&D).
- 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.
- The Borough should encourage more sites for start-ups and growing businesses and consider developing these itself as a long-term investment.

3.12 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?

There was a total of 15 responses to this question.

Key points raised

- High rents, changes in shopping patterns and lack of car parking.
- Less access to public transport as bus services are removed or cut.
- The current neighbourhood plans hoard all development into the Key Service Villages and is putting massive pressure on services and parking which have not kept pace.
- Equality and diversity is a key issue but does not seem to be addressed in the Scoping document.
- The significance of all heritage assets, including any contribution made by their setting, merits careful consideration.
- Declining town centres and the erosion of local services such as banks consolidate their activities.
- Maintaining viability and a range of services within town, village and neighbourhood centres is a key challenge, including the capacity and provision of suitable community and public services.
- 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.

- In terms of green infrastructure and wildlife: many urban areas have poor quality watercourses, scattered green spaces, and under-managed designated wildlife sites.

3.13 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 was a total of 8 responses to this question.

Key points raised

- Eccleshall needs more parking, Slindon need more housing.
- Stafford would benefit from park and ride facilities, free car parking / larger car parks.
- There is a need for cultural development using existing ‘at risk’ buildings.
- Financial incentives could potentially enable businesses to succeed in Stone.
- Additional uses should be supported, including community events.
- Stafford: 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.

3.14 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?

There was a total of 8 responses to this question.

Key points raised

- Stafford town centre.
- Need more provision for small independent shops.
- The significance of all heritage assets, including any contribution made by their setting, merits careful consideration.

- 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 Section 106 or CIL monies could be used to help fund enhanced services, to support these facilities.
- 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.
- A small-scale village centre at Cold Meece would provide one the best locations within the Borough to serve the existing and new resident community.
- Leisure and sports facilities can be sited at secondary schools and made available both to schools and the community.
- Major retail development should be sited at existing locations rather than developing new sites.

3.15 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 was a total of 11 responses to this question.

Key points raised

- No, the borough needs to help those existing retailers who are struggling to survive.
- 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.
- Opportunities to expand leisure in Eccleshall should be considered, such as adding bowls / play area to the existing tennis and cricket club to create a better overall complex.
- The provision of some offices in rural areas would support rural communities and the rural economy.

- Whilst there is reference to ‘other town centres’ the document as a whole gives little consideration to places like Rugeley and Uttoxeter in spite of the statutory requirement to work across boundaries.
- 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.
- 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.

3.16 Question 16

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

There was a total of 13 responses to this question.

Key points raised

- A swimming pool in Eccleshall.
- Eccleshall Parish Council are in favour of informal open spaces for play, including ball play areas.
- Facilities of a more diverse nature should be considered, such as climbing walls, zip wires.
- More tennis courts which should preferably be hard court and floodlit.
- More multi-use games areas.
- A Country Park in Eccleshall.
- 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.
- Woodland Trust would like to see the creation of new woodland and planting of trees in a variety of other contexts (e.g. trees in streets or parks or in housing area) prioritised in the local plan.
- 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.
- Any new residential development will need appropriate public open space and recreation facilities.

- Recreational pressure on Cannock Chase Area of Outstanding Natural Beauty (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.

3.17 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.

There was a total of 26 responses to this question.

Key points raised

- Recent developments seem to include very little green space in terms of gardens and landscaping. Can planning policy include a minimum area / percentage of landscaping?
- Eccleshall Parish Council are in favour of protecting Local Green Spaces and have already made provision for this within the Parish.
- Colwich Parish Council already has two Local Green Spaces designated in its Neighbourhood Plan and these should be respected in any future Local Plan. 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.
- There should be no increase in the designated Green Spaces that Hopton already has.
- 21 responses supported the proposal for land at Falmouth Avenue to be designated as Local Green Space, with evidence provided as to why the land is suitable for allocation. One of these responses also provided 27 other letters of support from residents.
- 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.

3.18 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 was a total of 13 responses to this question.

Key points raised

- 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.
- 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.
- 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.
- Staffordshire County Council's education team provided a response detailing the number of schools within the area and advised what thresholds would need to be met to trigger the requirement of new schools.
- Stafford College requires additional support to ensure that students from Stafford have access to the widest possible range of apprenticeships / vocational qualifications.
- There is a need for more classes for adults and pensioners, e.g. in the town centre.
- The data from the ongoing Cannock Chase Special Area of Conservation (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.
- Developers which are promoting their sites for development have advised that schools could be delivered within their sites if required.

3.19 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?

There was a total of 15 responses to this question.

Key points raised

- A safe car park is needed for St Chad's in Slindon near Eccleshall.
- Theatres Trust 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, suggest that the Plan promotes the delivery of a community-scale theatre / arts centre within Stone.
- 24-hour accident and emergency provision at County Hospital, and well supported ambulance services.
- Improved provision of bus services in rural areas.
- Car parking.
- Increase capacity for GP surgeries / increase in opening hours and walk-in health centres in the town centre.
- The Local Plan needs to embed the provision of social, recreational and cultural facilities and services within communities.
- 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.
- 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.
- Developers which are promoting their sites for development have advised that facilities could be delivered within their sites if required.

3.20 Question 20

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

There was a total of 16 responses to this question.

Key points raised

- There is a need for better designation of HGV routes.
- 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.
- 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.

- Woodland Trust would like to see the role of street trees recognised in the 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.
- 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 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.
- 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 have a significant role in improving health and wellbeing.
- Significant development should be focused on locations which are, or can be made, sustainable.
- 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.

3.21 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 was a total of 16 responses to this question.

Key points raised

- The plan should seek to embed Active Travel into development proposals delivering environments that encourage walking and cycling.
- Local public transport services could be improved.
- The Local Plan should promote the reinstatement of bus services to all of the Borough. The Borough Council should be dedicated to maintaining proper bus services in remote areas (even if this is uneconomic).
- The Borough needs 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 (Staffordshire County Council) and Highways England.

- 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.
- 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.

3.22 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.

There was a total of 8 responses to this question.

Key points raised

- Safe footpaths in the countryside.
- Eccleshall Voluntary Car scheme.
- 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.
- In Stafford town centre bicycles for hire should be available as they are in London.
- 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.
- Consider establishing a Borough-owned transport company to tackle 'market failure' on certain routes – or expanding community transport to do that.
- Producing and implementing a comprehensive plan for safe cycling throughout the Borough.

3.23 Question 23

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

There was a total of 14 responses to this question.

Key points raised

- Increased employment opportunities during the construction phase and potential for permanent employment at the railhead site.
- 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.
- HS2 will make Stafford a commuter town.
- It is essential that HS2 is used to draw people to Stafford and the Borough for work rather than making the Borough more of a commuting area to other places.
- 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.
- 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.
- There are no opportunities from HS2 in the Borough.
- Parking at the station will be even more of a problem than it is now.

3.24 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 was a total of 11 responses to this question.

Key points raised

- Support community transport services.
- Stafford Town needs new roads to spread / disburse the traffic load and certainly lower the volume.
- At the present time, Highways England is not aware of any specific transportation projects that the Council should be promoting in the Local Plan.

- There is a need for alternative through route to the east of Stafford with a river crossing / joining of the eastern ring road from the end of Beaconside to Baswich, crossing the A513 to the A34.
- A new highway link to the south-west of Stone, connecting the A34 with the B5026.
- HS2 offers the opportunity to create a new junction onto and off the M6 Motorway.
- Encouragement of low emission vehicles through provision of more charging points.
- Comprehensive plan for cycling.

3.25 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?

There was a total of 14 responses to this question.

Key points raised

- What is a local design panel? The document does not explain.
- The plan should provide more clarity over “sustainable development”.
- 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.
- Where applicable, a local design panel should be established and engaged to support the on-going master planning of potential development sites, where these are of a major scale, are particularly complex, or are sensitive in nature.
- The Local Plan should encourage respect for the Local Green Infrastructure Plan and for the Local Design Plan.
- The new Local Plan should establish design principles but should not be prescriptive so as to stifle innovative design or flexibility.
- Several developers stated not supporting 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.

3.26 Question 26

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

There was a total of 7 responses to this question.

Key points raised

- Welcome work done by the heritage officer and Historic England.
- 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.
- 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 by their contribution.
- A robust evidence base will be key in identifying what the plan can do to best 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.
- The Shire Hall and Carnegie Library buildings should be restored and reused to provide a sustainable community facility, not just more residential development. The Local Plan 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.

3.27 Question 27

What approach should the Local Plan take to ensure that Borough's landscape, AONB and its key features are protected and enhanced?

There was a total of 9 responses to this question.

Key points raised

- Better maintenance of public footpaths, including signage and access routes.

- 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.
- No development should be allowed to encroach on the AONB. Any development adjacent to a Borough landscape should be sympathetic.
- 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 should be conserved, protected and where appropriate, enhanced. Where possible, 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.
- Policies should be informed by the Landscape Character Assessment and seek to conserve and enhance the character of the landscape.
- The Local Plan needs to incorporate a 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 of 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.
- Development that is within or affects designations such as Green Belt, Sites of Special Scientific Interest (SSSI), the AONB or other constraining designations should be avoided where possible, or strictly controlled.

3.28 Question 28

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

There was a total of 9 responses to this question.

Key points raised

- The new Local Plan should continue in line with current Stafford Borough Council policies.
- Any proposed development close to these sites could be subject to a contribution towards the enhancement of such sites.

- Local Wildlife Sites, e.g. Lion Lodge Historic Saltmarsh, should be supported and promoted.
- Woodland Trust would like the new plan to replicate the very strong protection given to ancient woodland and ancient / veteran trees in part 1 of the current adopted Local Plan. This is particularly important as these habitats are irreplaceable and hence need the highest possible level of protection in planning policy.
- 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.
- There should be a review of the Borough's natural assets and there should be no development on these assets i.e. ring-fenced protection.
- Greater use should be made of Green Infrastructure Plans which are found in Local Neighbourhood Plans.
- Large scale development sites should be supported by 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.
- The Local Plan should provide for:
 - Protection and enhancement of existing sites, habitats and species
 - Creation of ecological networks and stepping stone habitats.
 - A strategy for the water environment.
 - Measurable net gain for biodiversity, preferably by specifying a standard for percentage gain, such as Lichfield has adopted 20% net gain.
 - Veteran trees outside ancient woodlands, these will need specific consideration as isolated veteran trees are often vulnerable.
 - During site allocation, there should be at least a basic assessment for any likely biodiversity issues, including habitats, protected and key species on any sites likely to be allocated for development.
 - 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.
 - 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.

3.29 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?

There was a total of 17 responses to this question.

Key points raised

- No review is necessary.
- It is not apparent that exceptional circumstances exist to review the Green Belt.
- 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.
- No objections to a Green Belt review, however, 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.
- Land should only be released from the Green Belt in the event that other brownfield or non-Green Belt land is not available.
- 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 conclusions for consultation.
- A new area of Green Belt between Stafford and Stone is required.
- A review is always required even if to confirm that the status quo should be maintained.
- Whilst less than a quarter of the Borough area may be identified as falling within the Green Belt, the Scoping the Issues document correctly identifies a number of other European and World level constraints that exist within the Borough. These designations benefit from a higher level of protection than the Green Belt. If 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.

3.30 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.

There was a total of 12 responses to this question.

Key points raised

- Solar is ok if properly planned.
- All new buildings should have some solar panels included.
- No to wind turbines.
- Solar and wind power should be encouraged.
- 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.
- New build housing should incorporate grey water systems.
- New housing needs to have a better (e.g. lower cost, easier to handle by the household and refuse contractors, and not be unsightly) refuse system for all categories of waste.
- The transition to bright white street lighting over the last decade needs to be reviewed.
- In support of electric cars, new housing should incorporate fast charging technology.
- Consideration should also be given as to whether hydrogen power cars will succeed.
- Woodland Trust would like the 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.
- Water generation by water pumps should be encouraged as the Borough has a lot of water courses such as rivers and canal weirs.
- 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.
- It is important that the Local Plan ensures protection of the water environment and new and retrofitted Sustainable Drainage Systems (SuDS), buffering waterside habitat, and removal of artificial barriers such as weirs and culverts may all form part of a strategy for achieving this, which may also help with flood management.
- The Local Plan should ensure a flexible approach to renewable technologies to allow for the constant improvements of products. The principle of energy consumption being as efficient as possible and

drawn from sustainable sources where possible should be supported in policy, provided it is realistic to do so.

- Greater pressure on water supplies means that rainwater harvesting should be considered more widely.
- 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%.
- Water power and ground source power.

3.31 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?

There was a total of 13 responses to this question.

Key points raised

- Not addressed equality and diversity, which would highlight issues such as bungalows / housing for the elderly, footpaths for wheelchairs, mobility scooters and prams.
- Cross-subject thinking with regard to the historic environment will be a beneficial exercise, to establish inter-relationships which should be considered.
- Affordable housing in perpetuity.
- Existing rural communities should be protected from overdevelopment.
- Might consider the effects of the internet, self drive cars, electric vehicles and Brexit for instance.
- 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.
- The Plan for Stafford Borough includes Policy E7 Canal Facilities and New Marinas, with supporting text at 9.29, and the Inland Waterways Association expects that this policy will be carried forward into the new plan. However, point H should be removed from that policy.
- It would be helpful if a policy was incorporated that recognises that a biodiversity strategy will emerge during the plan period.
- 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.

- It is vital that the Borough looks at new and imaginative ways to promote housing development. The Borough Council should consider how to 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.
- The Borough should consider much more joint working across Staffordshire to deliver services efficiently.
- The Borough should consider a substantially larger community transport scheme, in cooperation with other Districts and the County.
- Consideration will need to involve dialogue with neighbouring Local Planning Authorities (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).

3.32 General Responses

There was a total of 17 general responses which did not correspond to one of the above questions.

Key points raised

- The Stafford Borough Corporate Business Plan ought to mention hospital provision in its aim of providing a safe place to live.
- 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.
- The Marine Management Organisation (MMO) provided advice as to the situation when they would need consulting.
- Stafford Borough'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.
- Severn Trent Water promoted a site within their control for development.

- Sport England welcomes that the authority is updating its evidence base relating to playing pitches, built and indoor facilities. Also, the emerging plan should contain policies that reference Active Design.
- National Grid has no comments to make in response to this consultation.
- It is important that Cannock Chase Council and Stafford Borough Council keep a regular and constructive dialogue going forward, as both update their evidence and move forward to shape the next iterations of their Local Plans.
- Sustainability Matters in Stafford Borough posed a number of questions around how far can the Local Plan go towards addressing the scale of the ecological crisis.
- 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 is inadequate, primarily due to the lack of transport infrastructure to cope with the increased demand. If these non-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.
- The Environment Agency provided a number of comments regarding issues relating to the water environment that need to be addressed within the Local Plan Review and provided links to various guidance.
- The Coal Authority has no specific comments to make at this early stage in the process.
- 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.
- 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. The SHMA is on too coarse 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 Output Areas.
- Network Rail is keen to work closely with Stafford Borough Council, 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.
- 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. Given the loss of spaces at the existing Doxey Road lorry park, consideration may need to be given to whether there is an adequate supply of such facilities remaining in the Borough.

- 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 Staffordshire County Council's 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.
- 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 Plan needs to aspire to improve accessibility on the walking, horse riding and cycling networks (including towpath links) throughout the Borough.
- The Scoping document identifies that 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.
- Staffordshire Wildlife Trust 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.
- It would 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.
- While the current plan has had many successes, Staffordshire Wildlife Trust 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.

- Concern was expressed by Stone Town Council 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. In addition 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.