

# **The Plan for Stafford Borough Part 2**

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## **Publication Consultation Statement**

November 2015

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## 1. Introduction

1.1 This Publication (Proposed Submission) Consultation Statement describes how Stafford Borough Council has undertaken community participation and stakeholder involvement to produce the Plan for Stafford Borough Part 2 - Publication, through the previous stage of consultation and engagement. The Consultation Statement has been produced to fulfil the requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, which came into force on 6 April 2012, specifically the statement defined in Regulation 17 comprising “a statement setting out:

- a. which bodies and persons were invited to make representations under regulation 18;*
- b. how those bodies were invited to make representations;*
- c. a summary of the main issues raised by those representations; and*
- d. how those main issues have been addressed in the Local Plan.”*

1.2 The Town & Country Planning (Local Planning) (England) Regulations 2012 sets out procedures for the production of Local Plans, previously known as Development Plan Documents (DPDs). Regulation 18 (preparation of a local plan) of the 2012 Regulations effectively replaced Regulation 25 of the now superseded Town and Country Planning (Local Development) (England) Regulations 2004, and subsequent amendments. The 2012 Regulations makes it clear that work undertaken by local planning authorities before they came into force is to be treated as having been done under the corresponding provision of Regulations.

1.3 Regulation 18 specifies the consultation a local planning authority must undertake on a local plan before it can proceed to publish a pre-submission version of the plan. It states the following:

*Preparation of a local plan*

*"18.- (1) A local planning authority must-*

- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and*
- (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.*

*(2) The bodies or persons referred to in paragraph (1) are-*

- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;*
- (b) such of the general consultation bodies as the local planning authority consider appropriate; and*
- (c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.*

*(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1)."*

- 1.4 This Consultation Statement forms one of the "proposed submission documents" referred to in Regulation 19, as set out below. It highlights how the Borough Council has met the requirements of the Statement of Community Involvement (SCI), which was adopted on 26th July 2006 and the emerging Statement of Community Involvement .

*"19.- Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must-*

- (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and*
- (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18 (1)."*

- 1.5 Prior to seeking representations on soundness and legal compliance on the Plan for Stafford Part 2: Publication, the Plan for Stafford Borough Part 2: Proposals was consulted upon between 1<sup>st</sup> June and 15<sup>th</sup> July 2015. Leading up to this consultation stage discussions were held with those Parish Councils producing Neighbourhood Plans. In terms of who was involved in the consultation, section 3 sets out the organisations, including statutory bodies, who were invited to have their say and get involved in the Plan for Stafford Borough Part 2 (see Appendix 1). The Local Plan consultee database has grown significantly as the Plan for Stafford Borough has developed, to ensure all those who have engaged in previous consultation events are notified of future consultation stages. At present our database extends to in excess of 3,800 consultees.

- 1.6 It is important to emphasise that community engagement and involvement on Part 2 has been continuous throughout the process with individual communities across the Borough, along with other stakeholders including developers, landowners and statutory organisations. In addition, to ensuring information was made available on the Council's website, information has also been placed in the Borough Council's reception area at the Civic Centre, Riverside, Stafford.

## 2. Relationship to the Stafford Borough Statement of Community Involvement (SCI) and the Sustainability Appraisal (SA)

- 2.1 The Statement of Community Involvement (SCI) was adopted on 26th July 2006. It outlines who should be consulted at each stage of the Plan’s production and the types of methods which could be used for effective involvement. Since adoption the Town and Country Planning (Local Development) (England) (amended) Regulations 2008 have altered the stages of production of a Development Plan Document, removing the Preferred Options (regulation 26) stage and therefore reverting to a two, rather than three stage consultation system. Under current legislation, there are two stages where the document should be the subject of consultation, namely the early stage of document formation (Regulation 18 stage) when issues and policy options are being explored and developed, and then formal consultation on the Publication / proposed Submission version when the Plan has been agreed by the Council for seeking representations on soundness and legal compliance (the current stage - Regulation 19).
- 2.2 The emerging Statement of Community Involvement reflects recent changes in the Regulations. In preparing the Plan for Stafford Part 2, the Council has adhered to the procedures set out in the Regulations, and both the adopted and emerging SCI.
- 2.3 Table 1 below is an extract from the emerging SCI, showing what methods are to be used for consulting on each of the various Planning Policy Documents at different stages.

Methods	Development Plan Documents						Supplementary Planning Documents		Neighbourhood Plans			Community Infrastructure Levy			
	Evidence Gathering & Early Engagement	Development of Policy Options	Publication & Submission	Examination in Public	Adoption	Publication of Draft SPD	Adoption	Designate Neighbourhood Plan	Submission & Publication	Examination	Adoption	Preliminary Draft Charging Schedule	Draft Charging Schedule	Examination in Public	Adoption
Letters & Emails	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Online Consultation	✓	✓	✓			✓		✓	✓	✓	✓	✓	✓	✓	✓
Parish Forum Meetings	✓	✓	✓												
Focus Groups	✓										✓				
Display boards	✓	✓	✓												
Public Exhibitions & Workshops	✓														
Press Release	✓	✓	✓		✓	✓	✓		✓		✓	✓	✓		✓
Libraries	✓	✓	✓		✓	✓	✓	✓	✓		✓	✓	✓		✓
Council website – <a href="http://www.staffordbc.gov.uk">www.staffordbc.gov.uk</a>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Table 1

The Plan for Stafford Borough- Publication Consultation Statement (November 2015)

- 2.4 Stafford Borough Council has previously carried out several iterations of the Sustainability Appraisal (SA) process in relation to the adopted Plan for Stafford Borough (19<sup>th</sup> June 2014) throughout its development.
- 2.5 Table 2 below lists the iterations of the adopted Plan for Stafford Borough that have been produced and consulted on by Stafford Borough Council, as well as the accompanying SA work that was undertaken at each stage (which are all available on the Council's website<sup>1</sup>).

Date	Plan iteration	Accompanying SA work
October 2007	N/A	SA Scoping Report
January 2008	The Plan for Stafford Borough - Borough Wide Development Strategy	SA Commentary Volume 1
June 2008	Principles for Settlement Development	N/A
February 2009	Delivering the Plan for Stafford Borough - Issues and Options	SA Commentary Volume 2
September 2011	Draft Publication	SA Report
May 2012	Strategic Policy Choices	SA Report
January 2013	Publication (Pre-Submission)	Revised SA Report
April 2013	Planning Strategy Statement	Addendum SA Report
January 2014	Modifications Consultation	Modifications Addendum SA Report
June 2014	The adopted Plan for Stafford Borough	Sustainability Appraisal Adoption Statement
June 2015	The Plan for Stafford Borough: Part 2 Proposals document (Options Stage)	SA Report
December 2015	The Plan for Stafford Borough: Part 2 Publication document	Updated SA Report

- 2.6 The Plan for Stafford Borough Part 2: Proposals was accompanied by a SA report as identified in the table below. Whilst the consultation has been targeted via specific e-mail invitation to the statutory Government agencies: The Environment Agency, Natural England and English Heritage, anyone is able to make comments on the documents during the consultation. The consultation on this document took place between 1<sup>st</sup> June 2015 and 15<sup>th</sup> July 2015. No comments were received.

<sup>1</sup> <http://www.staffordbc.gov.uk/sustainability-appraisal>

### 3. Compliance with Duty to Co-operate

3.1 Section 110 of the Localism Act 2011 introduces a new Section 33A to the Planning and Compulsory Purchase Act 2004, namely a “Duty to Co-operate” (DtC). This duty requires planning authorities to work with neighbouring authorities and other ‘prescribed bodies’ on preparing development plan documents or activities which facilitate the preparation of development plans. However, the duty only applies where such activities are of a ‘strategic matter’.

3.2 The full list of ‘prescribed bodies’ are set out in the Act itself, as well as subsequent Town and Country Planning (Local Planning) (England) Regulations 2012. For Stafford Borough Council, they are as follows:

- Other local authorities, which Stafford Borough Council has taken to mean as all neighbouring authorities, namely:

-Staffordshire County Council;

-Cannock Chase District Council;

-East Staffordshire Borough Council;

-Staffordshire Moorlands District Council;

-Newcastle Under Lyme Borough Council;

-South Staffordshire District Council;

-Staffordshire Moorlands District Council;

-Stoke on Trent City Council;

- Shropshire Unitary Council;

- Lichfield District Council; and

- Telford & Wrekin Council.

- Environment Agency
- Historic England
- Natural England
- Network Rail
- Civil Aviation Authority
- Homes & Communities Agency
- Office of the Rail Regulator
- Highways Agency (West Midlands)
- Office of Rail Regulation

- Greater Birmingham & Solihull Local Enterprise Partnership (LEP)
- Stoke-on-Trent and Staffordshire LEP
- Centro
- Black Country LEP
- Defence Infrastructure Organisation
- NHS Property Services
- GP Commissioning Group
- Transport for London Customer Services
- West Midlands Passenger Transport Authority
- Greater London Authority
- Marine Management Organisation
- Staffordshire Police HQ
- Staffordshire and Stoke-on-Trent Partnership NHS Trust
- South Staffordshire and Shropshire NHS Foundation Trust
- Staffordshire County Council & Staffordshire NHS
- Mid Staffordshire Foundation Trust
- Staffordshire Wildlife Trust

3.3 The Borough Council worked closely with key stakeholders, service providers and statutory agencies on the adopted Plan for Stafford Borough, which identified the development strategy, sustainable settlement hierarchy and allocated significant development for Stafford and Stone through the Strategic Development Locations. As Part 2 establishes the settlement boundaries for Stafford, Stone and the Key Service Villages, it is considered that there are no 'strategic matters' included in this element of the Plan. Nonetheless, letters were sent out to all Duty to Co-operate organisations on 22 September 2015. Seven responses were received, all of whom have confirmed that, at this stage, there are no Duty to Co-operate matters of importance to raise (see Appendix 2). Furthermore Natural England have confirmed that the Plan for Stafford Borough Part 2 is not required to meet the Habitat Regulations Assessment (see Appendix 2).

3.4 In addition the Borough Council has worked jointly with the City of Stoke-on-Trent Council, Newcastle-under-Lyme Borough Council, Staffordshire Moorlands District Council and East Staffordshire Borough Council, in respect of the Gypsy and Traveller Accommodation Needs Assessment 2015. Furthermore the Strategic Housing Land Availability Assessment has been updated during 2015 through the Partnership.

## **4 Community Involvement and Engagement on the Plan for Stafford Borough Part 2**

- 4.1 In accordance with the SCI, Stafford Borough Council has undertaken consultations to involve and engage the community in order to prepare the Plan for Stafford Borough Part 2. This chapter sets out the main consultation / community engagement events that have taken place prior to the Publication version of the Proposed Submission.

### **The Plan for Stafford Borough Part 2: Proposals and Sustainability Appraisal Report**

- 4.2 In June and July 2015 consultation took place on the above documents, with the deadline for responses being 12 noon on 15<sup>th</sup> July 2015. Notification of the consultation process and information on how to respond was sent out to all consultees on the Council's Local Plans database.
- 4.3 To raise awareness of the Proposals document the Borough Council published information on the Borough Council website and provided press releases to a wide range of media organisations, including the local newspapers listed below:
- Staffordshire Newsletter (Stafford and Stone editions)
  - Express and Star (Stafford and Stone Edition)
  - The Sentinel
- 4.4 Copies of the documents could also be inspected at the Council Offices and Public Libraries within the Borough listed below:
- Rising Brook Library
  - Holmcroft Library
  - Baswich Library
  - Stone Library
  - Blythe Bridge Library
  - Eccleshall Library
  - Market Square Stafford Library
  - 4 Mobile Libraries
- 4.5 Stafford Borough Council considers that the consultation process used through the preparation of the Plan for Stafford Borough Part 2 has fully met the requirements within the Stafford Borough adopted Statement of Community Involvement, and is in accordance with relevant Town and Country Planning Regulations.

## 5. Summary of Main Issues and How they were Addressed

- 5.1 418 responses were received on the Plan for Stafford Borough: Part 2 Proposals Consultation Stage (refer to Appendix 1). The following key issues were raised through the responses received, shown in italics below, together with the Council's response:

### *Part 2 General Issues*

- 5.2 *The figure of 10,000 houses over the Plan period is target; it is not a ceiling or a maximum. The Plan is too reliant upon the Strategic Development Locations delivering the houses. There is limited opportunity for other sites to be allocated for housing.*

Borough Council response: The target figure of 10,000 new homes is not a maximum, but new development must be delivered proportionally in accordance with the sustainable settlement hierarchy. Furthermore, the proper planning of the Borough (and practical delivery of major change) requires also that growth be balanced by the timely and resourced provision of necessary infrastructure, and accommodated sustainably – which means that growth cannot be unfettered, but needs to be controlled and planned. Since a substantial proportion of the housing requirement is already determined by the provision made by the Strategic Development Locations (SDLs), and elsewhere in the Borough by subsequent development and by extant permissions, it is not necessary for the Part 2 document to make specific allocations for additional housing sites, other than those being promoted in the Neighbourhood Plans.

- 5.3 *Failing to identify community facilities in the Stafford, Stone and the Key Service Villages.*

Borough Council response: The Part 2 Proposals document identified community facilities in Stafford, Stone and the Key Service Villages. However following receipt of the representations, it is apparent that it is not practically possible to identify an exhaustive agreed list of all the relevant community and social facilities within those settlements and those in the rest of the Borough. It is proposed to omit the tables and Inset Plans identifying the community facilities for Stafford, Stone and the Key Service Villages and to amend the wording to policy SB2 to protect social and community facilities across the Borough.

### *Stafford*

- 5.4 *Land adjacent to Falmouth Avenue, Stafford, should be designated as a Local Green Space (66 representations submitted in total as well as the local MP Jeremy Lefroy).*

Borough Council response: The land at Falmouth Avenue was allocated in the previous Stafford Borough Local Plan 2001 as suitable for housing, but was never developed. The new Stafford Settlement Boundary excludes this area of land, as it is not considered suitable for development within the context of Spatial Principle 7 of the Plan for Stafford Borough. As a general principle, the consultation process has demonstrated that insufficient suitable evidence has been gathered to support Local Green Space designations throughout the

Borough in accordance with the requirements of the NPPF. Even where comments have been received, as in the case of Falmouth Avenue; evidence is not conclusive in terms of the NPPF criteria, and cannot easily distinguish local views about the relative importance of protecting land as greenspace from general expressions of opposition to further local development.

- 5.5 *The University of Staffordshire campus in Stafford should not be designated as employment land. The sports centre is not a community facility as it is not a facility that the public authority has a controlling interest in.*

Borough Council response: It is proposed to remove the employment site designation and amend Policy SB2 to protect social and community facilities, including sports facilities. As the facilities are available to, and used by, the general public, it is considered that the facilities will be protected under the policy. This policy states that alternative uses are only acceptable when it can be demonstrated that the site has been actively marketed for more than twelve months for alternative social and community use, it can be established that the facility is no longer required, or can be served in an alternative location within the same settlement or in a manner that is equally accessible to the community.

### *Stone*

- 5.6 *The tennis courts and playground Westbridge Park, Stone should be designated a local community facility. It should not be redeveloped to accommodate a supermarket.*

Borough Council response: The settlement boundary for Stone reflects the Green Infrastructure boundary that was identified in the adopted Plan for Stafford Borough. Change of use will be considered in the context of amended Policy SB2.

- 5.7 *Land at Westbridge Park should be designated as Local Green Space.*

Borough Council response: Local Green Space was not identified as a strategic issue within the adopted Plan for Stafford Borough and no detailed assessment has been prepared to demonstrate how the land meets the criteria of the NPPF. As a general principle, the consultation process has demonstrated that insufficient suitable evidence has been gathered to support Local Green Space designations throughout the Borough in accordance with the requirements of the NPPF. Even where comments have been received, as in the case of Westbridge Park; evidence is not conclusive in terms of the NPPF criteria, and cannot easily distinguish local views about the relative importance of protecting land as greenspace from general expressions of opposition to further local development. Westbridge Park is afforded protection through Policies C7 and N4 of the adopted Plan. Local communities have the opportunity to designate Local Green Space through Neighbourhood Plans.

5.8 *Additional secondary frontages should be identified in Stone.*

Borough Council response: Following the consultation, it is not proposed to have a policy on protecting retail frontages, as this does not reflect the changing nature of centres and the changes in retailing generally, caused by on-line shopping. The town centre policies need to allow flexibility to support their viability and vitality. Therefore the Publication document proposes to omit the inset plans showing the Primary and Secondary frontages for Stafford and Stone town centres, relying on Policy E8 of the adopted Plan for Stafford Borough and the approach in the NPPF.

5.9 *As shown on the Settlement Boundary for Stone, land adjacent to Nicholls Lane should not be included in the Settlement Boundary.*

Borough Council response: Agreed to exclude this land from the Stone Settlement Boundary. Local communities have the opportunity to designate Local Green Space through Neighbourhood Plans.

5.10 *Land adjacent to Tilling Drive, Walton, Stone, should be designated as Local Green Space (10 representations submitted).*

Borough Council response: Local Green Space was not identified as a strategic issue within the adopted Plan for Stafford Borough and no detailed assessment has been prepared to demonstrate how the site meets the criteria of the NPPF. As a general principle, the consultation process has demonstrated that insufficient suitable evidence has been gathered to support Local Green Space designations throughout the Borough in accordance with the requirements of the NPPF. Even where comments have been received, as in the case of Tilling Drive; evidence is not conclusive in terms of the NPPF criteria, and cannot easily distinguish local views about the relative importance of protecting land as greenspace from general expressions of opposition to further local development.

Tilling Drive is afforded protection through Policies C7 and N4 of the adopted Plan. Local communities have the opportunity to designate Local Green Space through Neighbourhood Plans.

5.11 *Stone Town Council and Stone Independent Group submitted representations to include land as Local Green Space.*

Borough Council response: Local Green Space was not identified as a strategic issue within the adopted Plan for Stafford Borough and no detailed assessment has been prepared to demonstrate how the areas meet the criteria of the NPPF.

The land identified by the respective groups will be afforded protection through Policies C7 and N4 of the adopted Plan. Local communities have the opportunity to designate Local

Green Space through Neighbourhood Plans.

### *Great Haywood*

- 5.12 *Land adjacent to Marlborough Close, Great Haywood, should be designated as Local Green Space (16 representations have been submitted).*

Borough Council response: Subject to designation within the emerging Neighbourhood Plan this land will be identified as Local Green Space on the Great Haywood Policies Map inset.

### *Woodseaves*

- 5.13 *The Settlement Boundary in Woodseaves should be amended to accommodate additional housing and a play area/car park to serve the school.*

Borough Council response: No changes are proposed to the Settlement Boundary as releasing this land would undermine the balance of the Sustainable Settlement Hierarchy in the context of completions and existing commitments already exceeded in Stafford, Stone and the Key Service Villages.

### *Inset Plans*

- 5.14 In addition following comments received the following changes have also been made to the Inset maps for Stafford, Stone and the Key Service Villages:
- 1 Stafford Settlement Boundary: Amend Stafford eastern settlement boundary so that it runs along Blackheath Lane.
  - 2 Stafford Settlement Boundary: amend settlement boundary to include land with outline planning permission at Leonards Avenue adjacent to the Alston Grid site (09/12207/OUT).
  - 3 Stafford Settlement Boundary: Omit Staffordshire University, the police headquarters from the employment zone.
  - 4 Stafford Settlement Boundary: amend MOD zone to reflect land ownership discrepancy south of Hopton Lane and amend settlement boundary.
  - 5 Ladfordfield Industrial Estate RIE – inclusion of land within the RIE boundary to take into account planning permission (12/16590/COU) to use the land for storage/parking.
  - 6 Colwich Settlement Boundary: Amend the boundary to omit Church Farm so that it is aligned with the Neighbourhood Plan.
  - 7 Great Haywood Settlement Boundary: Amend boundary to align with the Neighbourhood Plan.
  - 8 Hixon Settlement Boundary: Amend boundary at to include land that was granted planning permission for an additional; dwelling at Chase Farm View, Puddle Hill.
  - 9 Tittensor Settlement Boundary: amend the boundary to include the primary school.
  - 10 Remove primary and secondary retail frontages plans for Stafford and Stone.

- 11 Omit all Local Green Space from Inset plans.
- 12 Omit all community facilities from inset plans.

## **6. Conclusion**

- 6.1 Stafford Borough Council considers that the consultation process used throughout the preparation of the Plan for Stafford Borough Part 2 has fully met the requirements within the Stafford Borough adopted Statement of Community Involvement, and is in accordance with relevant Regulations.

## **APPENDIX 1**

### **Specific Consultation Bodies for Plan Making**

Adjoining Local Planning Authorities  
Canal and River Trust  
Civil Aviation Authority  
Highways England  
Historic England  
Homes and Communities Agency  
Local gas and electricity providers  
Local sewerage and water providers  
Ministry of Defence  
Natural England  
Network Rail  
Railway Infrastructure Managers  
Staffordshire Clinical Commissioning Group (CCG)  
Staffordshire County Council  
Staffordshire Police  
Staffordshire & Shropshire Strategic Health Authority  
Staffordshire and Stoke-on-Trent Local Enterprise Partnership  
The Coal Authority  
The Environment Agency  
Town and Parish Councils within Stafford Borough as well as those adjoining the Borough

### **General Consultation Bodies for Plan Making**

Airport Operators' Association  
Amenity groups  
Charities  
Civic Societies  
Community groups and residents' associations  
Countryside / conservation groups  
Culture, Recreation and Faith groups  
Disability groups  
Ethnic minority groups  
General Members of the Public  
Health groups  
Housing interest groups and housing associations  
Landowners and Developers  
Lesbian, gay, bisexual and transgender groups  
Local business groups  
Local Councillors and MPs

## The Plan for Stafford Borough- Publication Consultation Statement (November 2015)

Local Canal Societies

Local interest groups

Local media

Local Public Transport Providers

Local telecommunication providers

National Association of Gypsy and Traveller Officers, The National Federation of Gypsy Liaison Groups, and the Gypsy Council

Older groups

Stafford District Voluntary Service (SDVS)

Voluntary and Community Infrastructure Organisation (VAST)

Woodland Trust

Young Persons group

**APPENDIX 2 – DUTY TO CO-OPERATE RESPONSE LETTERS & NATURAL ENGLAND LETTER ON  
HABITAT REGULATIONS ASSESSMENT**



**Contact :** Clare Eggington **Your Ref:** AY/FP/766.0  
**Direct Line:** 01543 464326 **My Ref:**  
**E-Mail:** clareeggington@cannockchasedc.gov.uk

**Date:** 6<sup>th</sup> October 2015

Mr A. Yendole  
Planning Policy Manager  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

Dear Mr Yendole

**RE: Part 2 of the Plan for Stafford Borough – Duty to Co-operate**

Thank you for your letter of 22nd September concerning Part 2 of the Local Plan for Stafford Borough. In terms of the Duty to Co-operate and issues which apply between our two Authorities, the main issues relate to the partnership working arrangements relating to the Cannock Chase AONB and to the Cannock Chase SAC and of course both Authorities are already involved in these processes.

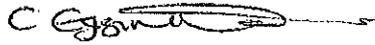
The other matter relates to ongoing dialogue between the two Local Authorities in terms of the broader evidence base and the fact that Cannock Chase District sits within the Greater Birmingham Housing Market Area, the relevant Authorities for which are currently working together to address a cumulative shortfall of around 39,900 dwellings to 2031 (mainly arising from Birmingham). Whilst Stafford sits beyond the HMA and thus is not engaged in this process, Cannock Chase District will need to ensure that there is continuing dialogue between the Authorities so that Stafford Borough Council is kept informed of progress. In particular this relates to the Green Belt Review work which CCDC has commissioned and of which Stafford BC is already aware.

We would, of course, be happy to attend a meeting to discuss these issues further and indeed continued regular dialogue would be beneficial to all concerned.



Tony McGovern | Managing Director  
Civic Centre, PO Box 28, Beecroft Road, Cannock, Staffordshire WS11 1BG  
tel 01543 462621 | fax 01543 462317 | www.cannockchasedc.gov.uk  
f Search for 'Cannock Chase Life' t @CannockChaseDC

Yours sincerely



Clare Eggington  
Planning Policy Manager



## Abby Brough

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**From:** Alex Yendole  
**Sent:** 07 October 2015 12:26  
**To:** Clare Eggington  
**Cc:** Abby Brough  
**Subject:** RE: DtC and Local Plan Part 2

Thanks Clare

Alex

---

**From:** Clare Eggington  
**Sent:** 07 October 2015 12:19  
**To:** Alex Yendole  
**Subject:** RE: DtC and Local Plan Part 2

Alex - specifically in relation to Part 2 there are no matters of importance in respect of the Duty to Co-operate as it is accepted that the issues raised in our response are of a strategic nature.  
Will this clarification by email suffice for your records?

Kind regards

Clare

---

**From:** Alex Yendole  
**Sent:** 07 October 2015 10:44  
**To:** Clare Eggington  
**Subject:** RE: DtC and Local Plan Part 2

Hi Clare

Thank you for the message and attached letter.

Please could you confirm that there are no matters of importance in respect of the Duty to Co-operate regarding the Plan for Stafford Borough – Part 2.

The issues listed in your letter are of a strategic nature associated with the adopted Plan for Stafford Borough.

Our Council will continue to work pro-actively with Cannock Chase Council on these matters.

Looking forward to hearing from you

Thanks

Alex

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**From:** Clare Eggington  
**Sent:** 07 October 2015 09:05  
**To:** Alex Yendole  
**Subject:** DtC and Local Plan Part 2

Dear Alex

Please see attached Cannock Chase Council's response to the letter regarding Stafford Borough Council's Local plan Part 2 and the Duty to Co-operate - hard copy in the post

Kind regards

Clare

**Clare Eggington**  
**Planning Policy Manager**

Cannock Chase Council

Civic Centre

PO Box 28

Beecroft Road

Cannock

WS11 1BG

[clareeggington@cannockchasedc.gov.uk](mailto:clareeggington@cannockchasedc.gov.uk)

01543 464326

## Abby Brough

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**From:** Alex Yendole  
**Sent:** 02 October 2015 15:39  
**To:** Harris, Kelly  
**Cc:** Johnson, Andrew; Fox, Edward; Abby Brough  
**Subject:** RE: Duty-to-Cooperate the Plan for Stafford Borough

Thanks Kelly

Alex

---

**From:** Harris, Kelly [<mailto:k.harris@sstaffs.gov.uk>]  
**Sent:** 02 October 2015 15:25  
**To:** Alex Yendole  
**Cc:** Johnson, Andrew; Fox, Edward  
**Subject:** RE: Duty-to-Cooperate the Plan for Stafford Borough

Hi Alex,

Thanks for the prompt response. I can confirm that we have no DtC matters relating specifically to the Plan for Stafford Borough – Part 2.

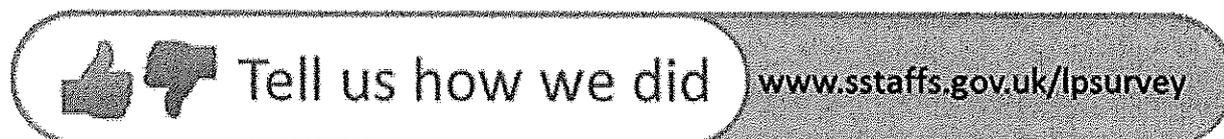
I look forward to working with you on future strategic planning matters.

**Kelly Harris**

**Team Leader (Local Plans)**

**Planning and Strategic Services  
South Staffordshire Council**

**Tel: 01902 696317**



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**From:** Alex Yendole [<mailto:ayendole@staffordbc.gov.uk>]  
**Sent:** 02 October 2015 15:16  
**To:** Harris, Kelly  
**Cc:** Johnson, Andrew; Fox, Edward  
**Subject:** RE: Duty-to-Cooperate the Plan for Stafford Borough

Hi Kelly

Thank you for the message and attached letter.

Please could you confirm that there are no matters of importance in respect of the Duty to Co-operate regarding the Plan for Stafford Borough – Part 2.

The issues listed in your letter are of a strategic nature associated with the adopted Plan for Stafford Borough.

Our Council will continue to work pro-actively with South Staffordshire District Council on these matters.

Looking forward to hearing from you

Thanks

Alex

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**From:** Harris, Kelly [<mailto:k.harris@sstaffs.gov.uk>]  
**Sent:** 02 October 2015 14:54  
**To:** Alex Yendole  
**Cc:** Johnson, Andrew; Fox, Edward  
**Subject:** Duty-to-Cooperate the Plan for Stafford Borough

Dear Alex,

Please see letter attached in response to your letter of 22<sup>nd</sup> September, regarding the above.

Thanks

**Kelly Harris**

**Team Leader (Local Plans)**

**Planning and Strategic Services  
South Staffordshire Council**

**Tel: 01902 696317**



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FAO Alex Yendole  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

**Please ask for:** Kelly Harris  
**Direct Dial:** (01902) 696317  
**Email:** k.harris@sstaffs.gov.uk

28th September 2015

Dear Alex,

**RE: Part 2 of the Plan for Stafford Borough – Duty to Cooperate Town and Country Planning (Local Planning) (England) Regulations 2012**

Thank you for your letter dated 22<sup>nd</sup> September 2015 inviting South Staffordshire Council to set out the cross boundary strategic issues between our two authorities that will need to be addressed under the Duty to Cooperate. The key Duty to Cooperate issues that we consider exist between the two authorities are set out below:

1) Housing

A housing shortfall within the Greater Birmingham Housing Market Area (HMA) of 37,900 dwellings up to 2031 has been evidenced through the Public Examination of the Birmingham Development Plan 2031. Stafford is a neighbouring HMA to the Greater Birmingham HMA. In the light of this cross boundary strategic issue, land South of Stafford could be looked at as making a contribution to the identified shortfall. The highway infrastructure to help facilitate such a development is likely to be located within the boundaries of Stafford Borough.

2) Employment

Whilst we do not consider there to be any immediate cross boundary employment issues that need addressing, this should be kept under review. In particular, if robust evidence for a Strategic Rail Freight Interchange (SFRI) within the West Midlands emerges then the cross boundary implications of this will need to be considered.

3) Cannock Chase SAC

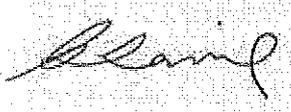
Both authorities are in the Cannock Chase SAC Partnership and are continuing to work on an ongoing basis to implement the Cannock Chase Visitor Impact Mitigation Strategy.

4) Retail

Our Core Strategy confirms that retail provision within the district be restricted to meeting the needs of local communities, and that our residents higher order shopping needs be catered for in towns and cities that adjoin the district, such as Stafford town. Therefore, the Council will support proposals coming through the Part 2 Plan that would see improvements to the retail offer in Stafford.

South Staffordshire Council fully recognises the value of working closely with Stafford Borough Council on an ongoing basis in addressing cross boundary strategic issues. As you will be aware, the Council is currently progressing our Site Allocations Document and hope to go out to consultation on our Preferred Options document by the end of the year. We welcome further discussion on the above issues raised and will look forward to maintaining constructive dialogue through the preparation of our respective plans.

Yours sincerely,



**Kelly Harris**  
**Team Leader (Local Plans)**

## Abby Brough

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**From:** Alex Yendole  
**Sent:** 02 October 2015 10:04  
**To:** DIO SEE-EPS PTCP1 (McCabe, Jodie Mrs)  
**Cc:** Abby Brough  
**Subject:** RE: Duty to Co-operate

Hi Jodie

Many thanks for the message and confirmation of no matters of importance in respect of the Duty to Co-operate.

Kind regards

Alex

---

**From:** DIO SEE-EPS PTCP1 (McCabe, Jodie Mrs) [<mailto:DIOSEE-EPSPTCP1@mod.uk>]  
**Sent:** 02 October 2015 10:01  
**To:** Alex Yendole  
**Subject:** Duty to Co-operate

Morning Alex

Hope all is well.

Just a quick email to note that I have received your letter relating to the Duty to Co-operate requirements and I can confirm that we have no matters of importance to raise with respect to the Duty.

Kind regards,  
Jodie

**Jodie McCabe**  
Senior Town Planner  
Environment & Planning Support

**Defence  
Infrastructure  
Organisation**

Kingston Road, Sutton Coldfield, West Midlands, B75 7RL

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**MOD Telephone:** 94421 2229 | **Telephone:** 0121 311 2229 | **Fax:** 0121 311 3636 |  
**Mobile:** 07747 461944 | **Email:** [DIOSEE-EPSPTCP1@mod.uk](mailto:DIOSEE-EPSPTCP1@mod.uk) | **Website:** [www.mod.uk/DIO](http://www.mod.uk/DIO)

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PLEASE NOTE MY WORKING DAYS ARE MONDAYS, WEDNESDAYS AND FRIDAYS

## Abby Brough

---

**From:** Alex Yendole  
**Sent:** 12 October 2015 08:40  
**To:** Taylerson, Kezia  
**Cc:** Abby Brough  
**Subject:** RE: Duty to Cooperate Stafford Borough Plan Part 2 Historic England response

Dear Kezia

Thank you for your message and confirmation about the Duty to Co-operate status of the Part 2 Local Plan.

Looking forward to continuing our dialogue as the preparation of Part 2 progresses.

Kind regards

Alex

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

From: Taylerson, Kezia [<mailto:Kezia.Taylerson@HistoricEngland.org.uk>]  
Sent: 09 October 2015 19:56  
To: Alex Yendole  
Subject: Duty to Cooperate Stafford Borough Plan Part 2 Historic England response  
Importance: High

Dear Alex,

Many thanks for consulting Historic England with regard to the ongoing Duty to Cooperate between our two organisations.

We met recently to discuss Historic England's representation to the Part 2 Local Plan and Stafford Council confirmed that the Plan related to amending settlement boundaries only.

At this time, Historic England can confirm that we are not aware of any strategic cross boundary issues and as such have no comments to make.

We would like to continue to be involved with the preparation of the Part 2 Local Plan and reserve the right to discuss future strategic cross boundary issues, if any arise.

I hope this is helpful.

Many thanks

Kezia

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## Abby Brough

---

**From:** Alex Yendole  
**Sent:** 12 October 2015 08:45  
**To:** Muller, Antony (NE)  
**Cc:** Abby Brough  
**Subject:** RE: Stafford Borough Local Plan pt2 - Duty to co-operate

Dear Antony

Thank you for your message and confirmation about the Duty to Co-operate status of the Part 2 Local Plan.

Looking forward to continuing our dialogue as the preparation of Part 2 progresses.

Kind regards

Alex

---

**From:** Muller, Antony (NE) [<mailto:Antony.Muller@naturalengland.org.uk>]  
**Sent:** 09 October 2015 15:23  
**To:** Alex Yendole  
**Subject:** Stafford Borough Local Plan pt2 - Duty to co-operate

Dear Alex

**Your reference – Consultation letter dated 22.9.15**  
**Our reference 166408**

Further to our conversation yesterday I can confirm that Natural England has no issues to raise in connection with Duty to Co-operate in respect of Part 2 of the Stafford local Plan.

Kind regards

Antony

Antony Muller

Lead Adviser

Sustainable Development & Wildlife Team - North Mercia Area

Direct dial - 0300 060 1640

Mobile - 07971 294109

<http://www.naturalengland.org.uk/>

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In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

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## Abby Brough

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**From:** Alex Yendole  
**Sent:** 12 October 2015 08:51  
**To:** Wooddisse, Ruth  
**Cc:** James, Mark; Abby Brough  
**Subject:** RE: Duty to Co-operate

Dear Ruth

Thank you for your message and confirmation about the Duty to Co-operate status of the Part 2 Local Plan.

I agree it would be very useful to meet and discuss Local Plan update. Please could you give me some preferred dates on Mondays, Tuesdays or Wednesdays.

Looking forward to continuing our dialogue as the preparation of Part 2 progresses.

Kind regards

Alex

---

**From:** Wooddisse, Ruth [<mailto:Ruth.Wooddisse@staffsmoorlands.gov.uk>]  
**Sent:** 09 October 2015 14:44  
**To:** Alex Yendole  
**Cc:** James, Mark  
**Subject:** Duty to Co-operate

Hello Alex,

Thank you for your letter dated 22 September regarding Duty to Cooperate issues.

The Council is currently dealing with responses to it's recent site options and development boundary consultation which ended in mid-September. I can confirm that at this stage there are no Duty to Co-operate matters of importance to raise, however we would welcome the opportunity to meet with you in the near future to keep you informed of updated evidence and other Local Plan work and to discuss any cross boundary issues.

Kind regards

**Ruth Wooddisse**

Senior Planning Officer (Forward Plans)  
Staffordshire Moorlands District Council and High Peak Borough Council  
Moorlands House  
Stockwell Street  
Leek, ST13 6HQ

Email: [ruth.wooddisse@staffsmoorlands.gov.uk](mailto:ruth.wooddisse@staffsmoorlands.gov.uk)  
Direct Dial: 01538 395400 Ext: 4139

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**District Council House, Frog Lane  
Lichfield WS13 6YZ**

Your Ref AY/FP/766.0  
Our Ref HH/DP1/10  
Ask for Heidi Hollins  
Email [Heidi.hollins@lichfielddc.gov.uk](mailto:Heidi.hollins@lichfielddc.gov.uk)

Switchboard +44 (0) 1543 308000  
Fax +44 (0) 1543 308200  
Direct Line +44 (0) 1543 308234  
☎ Minicom only +44 (0) 1543 308078

20<sup>th</sup> October, 2015

Dear Sir,

**Part 2 of the Plan for Stafford Borough – Duty to Co operate  
Town and Country Planning (Local Planning) (England) Regulations 2012**

Further to your letter dated 22<sup>nd</sup> September, 2015 I can advise that I consider the following are Duty to Co-operate matters of importance:

- Cannock Chase Area of Outstanding Natural Beauty
- Cannock Chase Special Area of Conservation
- Trent and Mersey Canal Conservation Area
- Cross boundary matters relating to the future development of Rugeley which could potentially impact on both our areas.

None of the above matters are currently incorporated in the Plan for Stafford Borough: Part 2 Proposals Consultation Stage and I can therefore advise that there are currently no matters of importance in respect of the Duty to Co-operate regarding this plan.

I look forward to continuing to proactively work with you on the strategic matters listed above.

Yours faithfully,

C Jordan  
Development Executive (Spatial Policy and Delivery)

## Abby Brough

---

**From:** Alex Yendole  
**Sent:** 02 October 2015 15:17  
**To:** Abby Brough  
**Subject:** FW: Part 2 of the Plan for Stafford Borough - Duty to Co-operate Town and Country Planning (Local Planning) (England) Regulations 2012

FYI

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**From:** Alex Yendole  
**Sent:** 02 October 2015 14:50  
**To:** 'Nicholas Rees'  
**Subject:** RE: Part 2 of the Plan for Stafford Borough - Duty to Co-operate Town and Country Planning (Local Planning) (England) Regulations 2012

Hi Nick

Thank you for the message and confirming that there are no matters of importance in respect of the Duty to Co-operate regarding the Plan for Stafford Borough – Part 2.

Kind regards

Alex

---

**From:** Nicholas Rees [<mailto:Nicholas.Rees@hca.gsi.gov.uk>]  
**Sent:** 02 October 2015 14:41  
**To:** Alex Yendole  
**Subject:** Part 2 of the Plan for Stafford Borough - Duty to Co-operate Town and Country Planning (Local Planning) (England) Regulations 2012

Hallo Alex,

Further to our telephone conversation earlier today in regard to your letter dated 22 September addressed to the Homes and Community Agency.

I am writing to confirm to you that there are no Duty to Co-operate matters, as defined in your letter, between our respective organisations.

Kind regards,

Nick

HELP SAVE NATURAL RESOURCES. THINK BEFORE PRINTING THIS EMAIL  
Homes and Communities Agency; Arpley House, 110 Birchwood Boulevard, Birchwood, Warrington, WA3 7QH (reg.address for legal documents) 0300 1234 500 [mail@homesandcommunities.co.uk](mailto:mail@homesandcommunities.co.uk) VAT no: 941 6200 50

\*\*\*\*\*

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Date: 13 July 2015  
Our ref: 155583/155561  
Your ref: **Pt2 Local plan**



Stafford Borough Council

For the attention of Alex Yendole

**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Alex

**Planning consultation:**

- 1. Stafford Borough Local Plan – Consultation on Part 2 of the plan (Part 2 proposal document)**
- 2. Plan for Stafford Borough Part 2 Proposal – Sustainability Appraisal**
- 3. Plan for Stafford Borough Part 2 Proposal – Habitats Regulations Assessment (HRA)**

Thank you for your consultation on the above dated 02 June 2015 which was received by Natural England on the same day.

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.

**Stafford Borough Local Plan – Consultation on Part 2 of the plan (Part 2 proposal document)**

Natural England acknowledges the context for this consultation as set out in the introduction to the consultation document (paragraphs 1.1-1.5) and defined in paras 1.6-1.8. We have considered the content of the Part 2 proposal document (including the questions posed by the Council) in relation to those themes within our remit and taking account of the adopted 'Plan for Stafford Borough' (PfSB - effectively the Part 1 document). As the PfSB has addressed those themes in our remit in a strategic way our consideration of the Part 2 proposals has focused on clarifying any aspects of detail that warrant further advice. Taking account of the adopted PfSB we are pleased to advise that we have identified no aspects that need further clarification and we have no objections to the proposed policy wordings set out in the document.

**Plan for Stafford Borough Part 2 Proposal – Sustainability Appraisal (SA)**

Natural England acknowledges and agrees with the SA report conclusion and recommendations.

## **Plan for Stafford Borough Part 2 Proposal – Habitats Regulations Assessment (HRA)**

Thank you for your separate consultation letter of 4 June 2015 on this subject.

Natural England notes the local plan circumstances described in your letter:

“...the adopted Plan for Stafford Borough 2011-2031 (June 2014) was subject to the Habitat Regulations Assessment process. The adopted Plan contains specific Environmental policies to address issues raised in the Habitat Regulations Assessment.

The Borough Council have now prepared the Plan for Stafford Borough Part 2 document. This document sets out settlement boundaries for Stafford, Stone and the Key Service Villages, together with boundaries for recognised industrial estates. However, as a result of recent planning consents in these areas and progress on a number of Neighbourhood Plans, which have individually addressed Habitat Regulations Assessment requirements, no significant new development is proposed within these boundaries.”

We agree with the Council’s conclusion that at this ‘Part 2 – Proposals’ stage of the Stafford Borough Local Plan the need for further Habitats Regulations Assessment can be screened out i.e. no further HRA is required. The Council should keep a record of this correspondence to evidence its thought process and our advice.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me on 0300 060 1640. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Antony Muller  
Lead Adviser – Sustainable Development and Wildlife Team – North Mercia Area