

Matter	Code	Summary of Response	Representatives	Council Response
Matter 9- Environment				
Matter 9- Environment	M9-2a	Object to onerous policies for zero-carbon. It is vital for viability to consider latest Government consultations and major changes to Policy N1 and N2. Policies undermining viability of new house-building programmes.	Home Builders Federation	Viability evidence through the Whole Plan Viability study includes an assessment of all the cumulative impacts including provision for Lifetime Homes and Code for Sustainable Homes requirements. Although the Government response to the consultation has not been finalised the Council has set out proposed changes through A27 to these Policies.
Matter 9- Environment	M9-3a	General support for Policies N1 – N3, N4 & N5.	Environment Agency	Council noted support.
Matter 9- Environment	M9-4a	Concern about ‘compliance’ with Building for Life 12 rather than ‘consideration’ as it can be difficult to judge if the criteria have been met. Concern about the burden of regulations and compliance with Code for Sustainable Homes leading to increased costs and repetition of Building Regulations. BREEAM standards should not be applied to non-residential schemes due to viability. Delete sections of Policy N1 and N2. Concern about Cannock Chase Special Area of Conservation due to impact on Community Infrastructure Levy / Section 106 agreements regarding delivery of housing provision, queries the number and nature of visits which will be less due to ageing population. Evidence base and decision making delegated to other documents is a real concern, leading to a lack of	Savills on behalf of Taylor Wimpey (UK) Ltd and Bellway Homes Ltd	The Council notes the latest Government consultations on zero carbon and new developments being delivered. Policy N1 and N2 suggested amendments in A27 for consideration. Do not accept that viability will be compromised by these policies. Policy N6 has been amended in A27, with the alteration appropriate to meet the Habitat Regulations Assessment Directive requirements and have been agreed by Natural England.

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		developer certainty. Delete Policy N6.		
Matter 9- Environment	M9-5a	Failure to secure agreement with the Black Country over the SAC mitigation. Natural England may wish to increase burden on developers.	Inglewood Investment	Natural England confirm that there is no wish to increase burden on developers. In fact the latest guidance suggests the costs for developers may reduce. Failure to agree with Black Country authorities does not negate the Borough Council's responsibilities as the competent authority under the Habitat Regulations.
Matter 9- Environment	M9-6a	There should be a separate policy for Trentham Estate and Gardens and that Policies N8 and N9 are too inflexible to respond to new developments at Trentham Estate and Gardens.	Barton Willmore on behalf of Trentham Leisure Limited	The Council considers that new development proposals can be adequately addressed by the economic and environmental policies in the Plan together with Green Belt policies in the NPPF. Therefore there is no need for a separate policy in this strategic context as no significant new development is required.
Matter 9- Environment	M9-7a	Concerns about soundness and justification of Policy N6. The evidence base is flawed as it is based on other sites in different parts of the country using a tariff based system. There is insufficient evidence concerning the impacts of recreation on Cannock Chase Special Area of Conservation (SAC) and its relationship to new housing. Reference to the fact that Cannock Chase is not a Special Protection Area and should not be protecting birds or have a development ban within 400m of the site. The impact of urbanisation is questioned and has been	Commercial Estates Group	The Council has delivered a robust evidence base to justify Policy N6, accepted by other authorities through the plan-making process and recent Examinations. Policy N6 is subject to a modification as set out in (A27) which removes the 400m buffer. The impact from recreation on the site are

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		<p>overstated. Queries the use of dwellings as a measurement tool due to the ageing population of Stafford Borough. Grazing is a bigger threat than recreation. Questions the use of Suitable Alternative Natural Greenspace (SANGS) and why Natural England hasn't prevented access to the site.</p>		<p>adequately demonstrated in the evidence. Adopting the precautionary principle is the most effective approach, through the amended Policy N6 to fulfil the Habitat Regulations as the competent authority.</p>
Matter 9- Environment		<p>A site specific policy should be included for Trentham Estate and Gardens as being useful. Specific reference to Listed or historic buildings to guide new development within the Registered Park and Garden should be included with the designated Conservation Area rather than more general wording to emphasise the significance of these heritage assets.</p>	English Heritage	<p>The Council does not consider it is appropriate to have a specific policy for Trentham Estate and Gardens, which can be considered through other policies.</p>