

Staffordshire Borough Council Local Plan Examination
Examination Hearing Sessions

Murray, G.S (Plans Team, Pins), November 2013

These notes are intended as a general account of the proceedings and are not a verbatim record.

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Table of Acronyms	
BF	Brownfield
BfL	Building for Life
CChase	Cannock Chase
CfSHs	Code for Sustainable Homes
CPO	Compulsory Purchase Order
DtC	Duty to Cooperate
EA	Environment Agency
EDR	Eastern Distributer Road
GB	Green Belt
MP	Master Plan
NSIP	Nationally Significant Infrastructure Projects
NWRail	Network Rail
RE	Renewable Energy
SAplan/dpd	Site Allocation Plan
SAprcess	Site Allocation Process
SBC	Staffordshire Borough Council
SbD	Secure by Design
SCC	Staffordshire County Council
SD	Sustainable development
SDL	Strategic Development Location
SHLAA	Strategic Housing and Land Availability Assessment
SHMA	Strategic Housing Market Assessment
TC	Town Centre
WBpark	Westbridge Park

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Attendees

Stephen J Pratt	Planning Inspector	SP
Sean Roberts	Programme Officer	SR
Georgina Murray	Note Taker	(not applicable)

Staffordshire Borough Council

Cllr Mrs Beatty		ClrB
Ted Manders		TM
Alex Yendole		AY
Melissa Kurihara		MK
Raj Bains		RB
John Holmes		JH
Mark Alford		MA
Phil Atkins		PA
Matt Ellis		ME
David Smethurst		DS
George Venning		GV
Michael Bullock		MB
Keith Nutter		KN
Paul Shukur		PS

Staffordshire County Council

Nick Dawson	Transport	ND
Jon Jarvis	Transport	JJ
Annabel Chell	Transport	AC
Andrew Marsden	Education	AM

Other Participants

Richard Thomas	Creswell Parish Council	RT
Cllr. Maria Redfern	Creswell Parish Council	ClrMR
Helen Beech	Newcastle-Under-Lyme BC	HB
James Morris	Newcastle-Under-Lyme BC	JM
Mathieu Evans	Stoke-on-Trent City Council	ME

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Edward Sidley	Stoke-on-Trent City Council	ES
Eleanor Taylor	Stoke-on-Trent City Council	ET
Antony Muller	Natural England	AM
Ursula Bennion	Housing Plus	UB
Chris Poulton	Housing Plus	CP
Dr Malcolm Bell	David Bowers	MB
Gary Spicer	Christopher Tibbitts	GS
Amanda Gray	Raleigh Hall Estates	AG
Ben Mcdyre	Raleigh Hall Estates	BM
Robert Luscombe	Inland Waterways Association	RL
Roger Savage	Inland Waterways Association	RS
Sue Green	Home Builders Federation	SG
Colin Campbell	Taylor Wimpey / Bellway	CC
Peter Weatherhead	Keep Westbridge Park Green	PWd
Ian Fordham	Keep Westbridge Park Green	IF
Tom Kelt	Keep Westbridge Park Green	TK
Sarah Wozencroft	Commercial Estates Group	SW
Justin Gardner (M3)	Commercial Estates Group	JG
Andrew Baker (M9)	Commercial Estates Group	AB
Paul Sharpe	Fradley Estates	PS
Chris May	Maximus Strategic	CM
Simon Tucker	Maximus Strategic	ST
Suella Fernandes	Akzo Nobel UK	SF
Tom Beavin	M J Barrett Group/ Walton Homes	TB
Stephen Stoney	Hallam Land Management	SS
Mark Sitch	St Modwen/ Trentham Leisure	MS
Phillip Sharpe	Inland Waterways (Lichfield)	PhS
Nicholas Bostock	Ingestre with Tixall Parish Council	NB
Anne Andrews	Ingestre with Tixall Parish Council	AA
Jonathan Heal	J Heal	JH
Robert G Jones	Robert G Jones	RGJ
Richard Evans	Richard Evans	RE
Tony Aspbury	Trent Vision Trust	TA
Paul Windmill	Paul Windmill	PW

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Tuesday 29th October

Stafford (Policies Stafford 3-4)

Policy Stafford 3 (West of Stafford)

1. SP: Introductions - Today we will cover West of Stafford, E of Stafford and this afternoon Stone town. HW will be available in the library.
West of Stafford: 2,100 houses and 2 hectares of employment
Want to know: details of the project from T. Wimpey, the west access improvement road from SCC and the impact on the castle re concerns from English Heritage.
Is there a statement of common ground?
2. AY: Yes and signed off by electoral representative
3. SP: Want to know the situation with English Heritage, they have concerns about the setting of the castle and they want the site reduced.
4. AY: content with boundary – green infrastructure and grading of development, increasing density further from the castle. English Heritage is content with principal of development so allocation can be delivered. Includes a concept diagram
5. SP: I'd like to see. Com estates have concern re delivery. Modern developments, what is your concern?
6. JT: development viability – access and ownership
7. SP: Taylor Wimpey, is there a transport trigger – 400 houses?
8. CC: Overall support but require clarification on policy
9. SP: EA? Low risk flood zone (to AE) SCC? Access improvement (to ND) SBC to introduce how W SDL came about?
10. AY: at the beginning it was subject to allocation and options to deliver significant new development. It was the most sustainable location being very central and benefitting from existing infrastructure. It will provide housing and mixed use for existing communities providing sustainable employment.
Drainage and flood measures

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11. SP: M42 re flooding for EA concerns?
12. AY: Yes
13. SP: p.54/55 of Plan – blue is mixed use – what is this?
14. AY: primarily for housing and B1 use not B8
15. SP: re housing development – 2,200 target re D51 depends on the amount of area for housing 1,900 – 2,177?
16. AY: Yes, housing area only (D51 method) 1,900 and mixed use 2,177. Developers have confidence that the site is deliverable
17. SP: Re what figure?
18. AY: 2,200
19. SP: Was the statement of common ground useful? What did you agree/ disagree on?
20. AY: Yes, there were 6 points of departure: Delivery requires master plan before planning application submitted. Range of sites more flexible – they wanted 1 and 5 bed acceptable
Environmental performance – on site renewable and sustainable consumption methods
Strategic employment location
Natural green space – transport
21. SP: when was this signed?
22. AY: this morning
23. SP: surprised re disagreement?
24. AY: No aligns with representations earlier in the year
25. SP: your view? Consider changes? Or are you rejecting?
26. AY: we think the policy is sound
27. SP: So no amendments?
28. AY: Yes
29. SP: Is the evidence sound?
30. AY: As submitted – appendix D of the Plan, infrastructure delivery plan statement 2 and transport with direction of growth
31. SP: D26 transport of SCC?
32. AY: Yes
33. SP: are the developers confident that the site can be delivered, as in statement of common ground?
34. AY: yes

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35. SP: (to CC) What are you interested in?
36. CC: there are 4 landowners: St Modwin – 19,500 hectares/
Stafford Homes/ Taylor Wimpey have options on 69 hectares
and North Martin drive and 5/6 hectares – Giles family – Taylor
Wimpey in discussion – require separate access from Oxley
road
37. SP: Own house-building project? Belaway – see them
delivering within the plan period?
38. CC: Yes 2,200 are deliverable. 109 hectares in SDL – 60
hectares net deliverable area
39. SP: re employment – addressed from SBC change amount to
plan – happy?

40. CC: yes with removal of 'e'
41. SP: 5 hectares of employment within housing/ mixed use
42. AY: mixed use depends on location – neighbourhood centre
and where care provided
43. SP: So, confirmation that the site is deliverable. Re castle site
and concern about delivery?
44. JT: the castle work – see as a commitment, part of St Albans,
brown field and also green space
45. SP: Is Plan unsound with this development in the Plan?
46. JT: Main focus on Stafford town is half housing – call for
integrating SDL development, criteria for infrastructure. SBC is
restricting development elsewhere. Re western access
improvement for SBC I require evidence – NPPF para 117.
Want to understand as I have a site to bring forward. I haven't
received the statement of common ground – we have a land
holding so I'd like to see it. And re SCC letter, we have
concerns that CPO isn't included in the Plan.
And viability report 5.6.1 SBC unusual in that development
focused in 3 SDLs – prompt details.
At 1.2 – study is high level, too many uncertainties
At 1.3 – claim buy-in from developers that it's a useful guide
At 1.4 – fundamentally different at development control stage
At 1.5 – competition with infrastructure

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Values to be increased and costs significantly lower to meet viability – SBCs evidence isn't strong

47. SP: what do you want? ...SDLs at different stages? N and E have PP so little I can do. Viability is a snapshot in time
48. JT: accept but too high level, it is a substantial component of supply
49. SP: signatures to statement of common ground (to CC) are you content that the site is deliverable and it is a viable project?
50. CC: re statement of common ground there were discussions on what in assessment and SBC made changes
51. SP: (to SW) – evidence/ feeling re deliverability?
52. SW: no objection to staff W but concern on site deliverability and so the soundness to meet need and plug the gap, concerns re number of units and western access improvement scheme (WAIS)
53. DW: WAIS depends on government funding
back up plan? Commitment from?
Very complex and expensive scheme – multiplicity of landowners – can we calibrate an agreement?
Requires CPO – NWRail
40 mil doesn't include land value I think just road scheme
Ransom payments (Radsick and Rock Case), therefore the suggested trajectory is too optimistic
54. SP: Require figures – trajectory as HW
55. CC: Misunderstanding re what is required to deliver W. SBC section c from martin drive to doxley road is fully committed to delivery. RE claim `CEBs statement depends on Wern mainline' – separate part of Wern access. Re update on section A and B – Taylor Wimpey has options, met with NR and they stated it was out of use in 2015 so available for development from then or if not, we have an option to cross at a higher level over the train.

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Re St Modwins – Taylor Wimpey have written to them to buy the land. Not in agreement yet, in negotiation. There is a letter from SCC preparing t CPO so there are no concerns re delivery.

56. SP: 400 house trigger when do you foresee your part coming forward? Short/medium/long term?
57. CC: Castle is in the planning process – to deliver early 2016. Re 400 trigger D26 tests delivery ahead. WAIS – detailed TA with sustainable transport so don't think the Plan should constrain. 500 may be delivered
58. SP: not in policy in application, housing document may change
59. CC: agree
60. SP: JT?
61. JT: SCG – infrastructure, concern re CPO
62. Implications – time/ trajectory/ costs and viability – minimum land value threshold. RE 400 trigger – infrastructure is important and so concern re claims that 'trajectory should be put back' only 400 allocated until infrastructure delivered?
63. SP: CC says 500
64. JT: suggest it could be less? If flexible both ways
65. CC: some sites can deliver more affordable housing with direct growth funding WAIS. I'm not saying it can't deliver more affordable housing; suggest that some sites can't deliver their infrastructure
66. SP: we're hearing concerns re delivery so let's hear from SBC re WAIS – how will it be done and what about CPO?
67. GV: St Modwin not included in consultation as already had PP. Re high level detail – can't apologise for the inherent uncertainty, at PP stage we'll use the data of that time – used industry standard figures not cost optimisation
At first assessment level of house prices were less prepossessing
-now we think new house prices – i.e doxy road scheme
-hope as site matures it'll achieve a premium. LH delivery corporation not making presumptions of increase housie prices but delivery will establish own house prices

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-re land values – assembly standard application for affordable housing and infrastructure like at current and premium.

Stafford has a lower value – 20% increase in agricultural land isn't much. Assessment generally include increase factor of 10 so £250th/hectare

-we're not attempting to constrain, just being realistic not saying it won't increase to 220/hectare

-also acknowledging circumstances where values don't increase to level £27th/units and with affordability levels

68. SP: re para 55 NPPF? What proportion of costs of WAIS included?
69. GV: figures for infrastructure inclusive of totals. It depends on the extent of WAIS delivery, included the costs we knew at the time. Also value underestimate that primary healthcare 70 GPs would pay rent, which would be recovered and not all education funding would fall to developers.
70. SP: What is the figure for WAIS?
71. GV: includes C scheme not land, funding will change

72. SP: SCC what is the position with WAIS? About the scheme, how delivered, timing and funding?
73. ND: Change commercial relative to opposite side. Belaway – martin drive and doxley road no cost to SCC
74. SP: Is the most recent document in the examination library?
75. ND: the most recent one is the 12th may 2011. RE SWAI – SCC require section C. the established construction costs are £4 mil. £37 mil may inflate to 47mil funding from partnership with Stoke - LEP
76. SP: Where are you now and how much?
77. ND: 16.3 mil and opportunity to bid for more
78. SP: £40 mil government funding? Currently £30 mil for entire project and cycleway and footbridge - £26 mil from public sector and we'll also look for development contributions
79. SP: LEP where require?
80. ND: NO – £16.3 mil
81. SP: competing scheme

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82. ND: RE trigger point infrastructure delivered early (section c) – existing situation isn't satisfactory due to congestion. Agreed in October 2012, no opposing statements
83. SP: 400 figure – evidence for western direction of growth? Do the figures support this and are they movable?
84. ND: Yes could change re loading most from doxley road
85. SP: is there a reasonable prospect of WAIS being delivered within the timescale you envisage? Or, are there hurdles and restrictions delaying for example if LEP don't have £16.3mil?
86. ND: to make transport, especially access depends on public funding – single growth fund. Very confident and more so for section C
87. SP: how much development is released for C?
88. ND: Whole development could be released
89. SP: cost? Established last week 4mil not including land.
Include CPO for access ST Modwin?
90. ND: repeat to cabinet for CPO but Plan threatened
91. SP: to enable 2,200 dwellings to be delivered requires the first phase which is 4 mil and so prepare to CPO and have land owners letters to confirm and you're not required to pay for the land? SO what is the prospect of delivery?
92. ND: excellent
93. SP: delivery and road scheme first CC
94. CC: Re GD re viability we suggest cost 8 mil for road at section C, including ransom value. Now C is 4 mil.
95. SP: (to JT) tell me about this free land?
96. JT: no land acquisition as developers will cover no assessment for value of land. Approach has been - what is reasonable to assume. It depends on NR and ST Modwin – what is their option agreement? Case law – Cambridge
97. GV: Appendix D schedule of infrastructure – 45 mil and 4 mil SCC re phase 1 (section C) =47 mil, which is 21th/unit – at the bottom end
Original figs less than that and include 8mil for healthcare so land acquisition with infrastructure 23th
98. AY: SCG to give

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- Parish Council: JT include ransom on value, SBC pessimistic, SCC over optimistic as the reality isn't 40mil for infrastructure
99. DR: M.17 re 'transport critical', I require more clarity if 2,200 houses and £7 mil for road scheme
- 100.SP: SBC require tweak to appendix?
- 101.ND: figures allow for inflation 2010 -2013 civil engineering industry costs. Have changed to 30mil
- 102.SP: SBC tell me the latest figures for the plan?
- 103.ND: rarely have figures up front for scheme
- 104.SP: HW fig 4 M117 correct cost

* * *

- 105.SP: Now concentrate on **W of Staff**. Re SCG, is there no change to the Plan?
- 106.AY: Correct
- 107.JT: 1. Headline point neither St Modwin/ NR are signatures as main owners. ST Modwin options/ agreement with NR. 2. SCC cabinet members haven't included assurance in their letter to SCC
- 108.CC: Re areas of disagreement we will cover Thursday i.e environmental performance and SANGs. Improvement of Newport rd to be deleted – D26 but significant improvement access – SCC don't include as part of scheme. APPENDIXES D agree with DW. Don't want plan to prescribe sizes and types of dwellings, would like option to include 1 bed (bed tax) and 5 beds. Re master plan, to be agreed before planning process? Re costs, GV's report 8 mil for section C. Our option 2001 w NR assumes 33% ransom. This has been included in GVs report and is the bases on which Taylor Wimpey agreed it was therefore viable.
- 109.SP: never get a perfect Plan – are these elements of an unsound plan, or part of your wish list?
- 110.CC: they would make it more effective and more flexible. They can be sorted through DC process

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- 111.DR: see D26 in conclusion [reads quote 'report confirms congestion..']. SBC presuming WAIS, otherwise how to access town centre?
- 112.SP: are other parts of WAIS critical to development of 2,200? How is the rest to be delivered – developer or public funded?
- 113.DR: not as critical
- 114.CC: SW access pre dates – whole is required for the plan
- 115.SP: so it is critical to the whole plan?
- 116.CC: yes critical para is final in D26 – 'beyond 400 to 2,200' – require section C. Are there more amendments?
- 117.SCC: No. the critical part for the plan is section C to make whole plan acceptable and section C is critical for SDL.

Stafford East

- 118.SP: PP for 434 dwellings and PP for 22 hectare of employment support for E. developers are happy here. Parish Councils can introduce E SDL. Where are we now? what are the changes to access arrangements? What is the delivery time frame?
- 119.AY: supported with evidence and appendix D of plan and policy 7.4 – viable scheme. Establish PP circumstances – meet requirements for 7.4
- 120.SP: include 30% affordable housing?
- 121.AY: Yes. Minor modifications re drainage and improvement of wording – transport infrastructure and water M34 –M46
- 122.Wider removal – beyond S Valley remove section of distributor road from reps so support for change and evidence D24
- 123.SP: amount to access – SCC
- 124.AY: Yes
- 125.SP: Re transport changes to how staff and E SDL distribute road. Is there an inconsistency between policy and proposals map?
- 126.SP: re submitted – amend 45, FAM 19 necessary to change policy since submitted plan change. Minor?
- 127.AD: if it's not in policy don't need to change
128. SP: what was intended – any changes relating to E distributor and E access improvement

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- 129.AD: No
- 130.SP: what are your concerns?
- 131.Parish Councils -AA: E requires significant improvement –
commuted traffic
Adding 600 houses and to the E side of Clark Farm – access to
M6 – narrow bridges and not for large vehicles. For all
problems SCC proposes traffic lights, which won't help. Item
5.3 Staff EDR priority but by 6.12 say E access – transport
evidence E improvement – consider lower cost. Our point is
that we object strongly.
- 132.SP: highlight serious traffic problems. You want the whole EDR
before any development? How will this be funded? SCC points
wanted – public funding?
Parish Councils -AA: SCC completely inaccurate think road to
Baswich Lane is required
- 133.SP: SBC – PP for employment and housing – assume there is
an agreement to improve the road?
- 134.RT: SBC explain M31 – removed and add same words. Concur
with AA – take out route – blue line in structure plan. Affects
core policy, whole plan. Most development to N and E. If can't
afford road now then when? Developers emphasised it would
be an internal estate road not a dual carriageway but the
volume of traffic expected for site traffic is 4 thousand vehicles
passing twice a day. With 3 SDLs around town – 3 access
roads so piecemeal approach
- 135.PW: more than 630, which road bridge does phase 1 refer to?
Re castle development, not to be approved before overall
development brief agreed – how realistic is this?
136. SP: How do you expect site to come forward, access
improved?
137. SW: re position with allocation, CEGs involvement to deliver
eastern road, triangular site, the other is a rectangle [all
looking at map]. Two developers are working together on the
master plan. Re transport staff E has been modelled, so the

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site isn't being considered in isolation. I concur with PW, there is a small piece of land to NW – university owned and they are party to proposals but they have chosen not to get PP. Can get access from N. Two outline permissions reflect how infrastructure and 634 dwellings will be delivered and are confident with master plan from house builder.

RE, what will be delivered? More than 600 dwellings – 75 units, contributing 2 ½ mil to education (mostly primary), open space, 1 acre of cemetery expansion. To deliver E distributor road – phase 1 require a roundabout with new four-way junction. Can't occupy more than 131 units before road is delivered so deliver early on. First phase from 2014 and ensure phased development. CEG Stafford E is an opportunity for bigger extension. Think we can deliver more development to the N.

- 138.DR: think that is a reasonable alternative – SEA ok if required
- 139.SP: SCC to explain E distributor route – how much, other funding? And what are the parish council's concerns re traffic existing and resulting from development?
- 140.AD: delivering just section A of distributor road would benefit local roads and wouldn't add traffic to Basich Lane
- 141.SP: D24 evidence for E
- 142.AD: EDR to Cannock road to A449. Look at section B to Commall drive. Cost 26mil (later corrected to 23mil)– high and more use of first street, more traffic to Basich lane, more traffic to area to Lichfield road and there are delivery issues. Section A is critical but B is not and section C and D have lower strategic benefit. Only section A is critical infrastructure
- 143.SP: D24 pg.6 corrected cost of section B
144. AD: total 65mil
145. SP: Is the whole length of E route in plan?
146. AD: yes up to Milford Rd and SCC protects through to A34
147. SP: how?
148. AD: on our searches if developed
149. SP: so that part of the route isn't protected in this plan?
150. AD whole route is recommended removed as not policy

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151. SP: how much of EDR is on policy map?
152. AY: yes existing alignment between policy and policy map
153. SP: propose to remove?
154. AY: page 6
155. SP: what of main or minor modifications?
156. AY: FAM 19
157. SP: PP granted tied to section A and would like to retain section B as protected. Is it likely that the whole EDR is delivered?
158. AD: no prospect
159. SP: delete EDR that is unlikely?
160. SW: confirm cost of £4 mil
161. SP: PP to section A, section B protected, while section C and D are not realistic so have been deleted – yet to determine if this is minor or major modification re soundness of plan
162. AA: concern section A – road to st Thomas land, the T junction leads to a narrow bridge where large vehicles have a problem and often have to be toed out. SCC propose traffic lights – no use! SCC haven't addressed these concerns and now proposed to abandon EDR.
163. NB: just access to development, not for additional traffic
[WHO]
164. RT: 1. Grade I and then down graded. 2. St Thomas lane is a road to nowhere. Happy SP thinks his is more than a minor amendment to the Plan, where was the community involved? A13 beacon side can't cope. At this end of town the plan is unsound.
165. SP: Re western direction of growth? Can you provide contrary evidence?
166. RT: no we'll never be in such a position – anecdotal
167. PW: Sec A same as SBC's – if same wording needs to be changed – minor modification?
168. SP: 'western rd to basich lane' MM44 – whole new paragraph doesn't refer to phase 1
169. AD: phase 1 suggests recommending delivery of full EDR just beacon side of st Thomas' lane
170. SP: [reading MM44] section A of your scheme?

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- 171.AD: yes
- 172.SP: confirm change refers to sections C and D of EDR – end at 513?
- 173.AD: recommend removal of C and D
- 174.SP: FAM 19 only refers to C?
- 175.DS: should say A34, from councils' point of view only depends on first part
- 176.SP: to be considered very carefully. Parish councils think existing problems before development. Have you done a traffic study? Is it deliverable? So there are modifications – and further modifications. Re development boundaries propose modifications and remove boundaries?
- 177.SP: we've heard the strategy for Stone. Clarify further modifications:
- mod 48 office and PD/ mod 49 housing over shops
 - mod 51 flood risk
 - retail report
 - drainage
 - key diagram – existing green infrastructure
 - 1400 sqm convenience to 1700 FAM 20
 - 2200 sqm comparison to 400 sqm
 - WBpark – provide mixed use to leisure community (don't include residential
 - Amend town centre boundary to include WBpark
 - Amend town centre boundary to include green infrastructure at WBpark
178. MK: requires more consultation
179. SP: boundaries, figs and revised boundary may be more major amendment as it may change the nature of development – 6 weeks needed for consultation
180. (KWPG)PwD: substantial modifications FAM 20, 21, 22 as the plan is fundamentally changed and changes could have been brought forward earlier, they appear to be responding to statements. I am concerned that SBC will be the judges in their own court.
181. SP: you'll have consultation

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- 182. DS: review 4 options and concluded the preferred option to withdraw boundaries through SAdpd but SP7 would still apply
- 183. SP: policy refers to boundaries that they don't have
- 184. DS: not replacing – no boundaries towards the edge and policy is more restrictive
- 185. SP: look at C5 refers to settlement boundaries
- 186. DS: this is for when they are in place
- 187. SP: Re Stone TC (town centre) is there scope for more retail development and is there evidence to justify original and revised (FAM 20)
- 188. PS: was considered in 2010 under PPS4 looking at shaping patterns to understand convenience and comparable goods. RE Stone significant alteration. Morison's shows a quantitative need requires more floor space. Early 2013 – updating retail study, comparison good repressed and special form of trading reduced. Evidence base includes local shop patterns and independent research under codes of conduct
- 189. SP: D15 pg.55 quantitative and additional convenience by 2031 to 3700 lower end. More medium size, more appropriate for catchment area -zone 2- and existing patterns – 20% drive to Stafford and 30% to SoT (Stoke on Trent). Reps say there should be one store.
- 190. PS: recommend one store – choice of comparison goods
- 191. SP: Morison's more than 1700 what does this look like? Like Aldi (i.e on A34 in Stone) 2 ½ thousand sqm?
- 192. PS: add potential sites? Yes 2011 – sequential sites and the best site was WBpark
- 193. PS: compared 4 – 1600 but gone for lower
- 194. SP: yes
- 195. PS: this Plan makes provision for 1700 sqm convenience and 400 comparison
- 196. SP: What does the plan say? We're dealing with this Plan first. I don't see the link between original and modifications i.e. comparison and sports goods, doesn't say convenience floor space
- 197. MK: doesn't specify convenience/ comparison, doesn't specify amount not allocating retail in the Plan

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198. SP: strategic Plan why highlight WBpark in this Plan?
199. MK: retail evidence identified it as the best in sequential test
200. SP: subject to specific allocation on policy map? Apart from incorporating TC boundary
201. MK: site included through modification but not subject to specific TC allocation
202. SP: two aspects: 1. Within TC boundary – consequences – why change?
203. TM: relates to TC activity retail is just one also leisure is an appropriate TC activity
204. SP: if within TC it wouldn't require a sequential test
205. TM: yes
206. SP: So by incorporating it is automatically identified as part of allocation as doesn't require a sequential test
207. PS: position of TC 'to allocate a range of suitable...' – best site available and preferred option
208. SP: others?
 - CP Morison's, forms the function of TC
 - Stone and Canal Wharf area
 - war site isn't large enough for quantitative need
209. WBpark is partly within the flood plain so requires sequential test? Re policies and words of plan require sequential test? Requires sequential test re whether principal of development is acceptable here?
210. MK: strategic flood risk assessment and EA engagement as part of Plan. Requires mitigation measures
211. PW: re flooding J6 para 6.2 'sequential test as early as possible to consider alternative sites'... Require 6.6 compensation down stream... 7.6 sequential test as a priority therefore evidence supports allocation. Re retail – para 8.14 of the Plan don't allocate retail M21 now retail suitable – conflict with the Plan? Re PS – but competition could be absorbed and convenience could also be included now boundary includes additional sites. Para 2.20 – capacity. WYG D15 pg. 48 Morison's over trade, Co op down (4.5) – very little qualitative analysis. Para 4.24 D15. Additional capacity isn't needed. WYG survey questionnaire 70% zone 2 nothing

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- about parking. No evidence of unacceptable over trading. Re Stone has more market share – 96% expenditure – limited ability of retention – para 5.4 D16. Evidence doesn't support allocation at WBpark
212. (Stone 'resident) TK: concern doesn't define retail figure. D15 table 6.5 require by 2021 1200 to 1700 by 2031. SBC consulted re WBpark about convenience food at 1200 sqm modification of Plan is an open-ended invitation to develop for convenience. WYG D17 – valid re convenience requirement – see table 5.2 – appendix 6 1,782 (2007) to 1739 (2010). D15 – 2189 – 20 or 26% higher. Shopping 89% D17 appendix 4 68% (less than 50% of population) gives an artificially high usage of Morison's – people are just as likely to go elsewhere, the numbers aren't accurate
213. RGJ: re flooding rep J6 – procedural documents future proofing area of flood risk 2 to 3 requires 86 metres minimum and road at 85ms, dry access roads see flood maps of TC
214. JH: look consultation procedure, lack of transparency 1. Original meeting with Clr Heaton leisure funded by developer so site sacrificed. 2. In consultation people wanted leisure facility improved and thought only way was if funded by supermarket – see the leaflet. More than 1100 against and 700 in favour. Park not defined as now. Require a map where supermarket might stand (300 people came). The artist's impression was dishonest re perspective and visibility of green space.
215. SP: J19 – Beattie communications rep – what purpose? Part of the local plan process?
216. MB: cant be planning for this significant development here.. no clear boundaries in Plan. Para 8.3 changed too? Can't react on the hoof.
217. RE: in favour of development re D16 table 5.1 Morison's retail 45% smaller and trading within 15% so significant over trading. Re D15/ D17 gap analysis Waitrose depend on non competition 15.8% population increase 12% above national average so retail provision is modest and not realistic
218. SP: so you support mixed-use leisure and supermarket?

- 219.RE: yes
- 220.RL: inland waterways re size of retail development endorse previous points – why WBpark? Support development that is appropriate here to regenerate canal. F people shop here they may by-pass Stone TC. There are 7th boats passing through here.
- 221.TA (TVT): promoting alternative use at W of WBpark. [HW to submit plan for alternative site] Thinks solution is to leave details and issues to SAdpd re mixed use development at WBpark.
- 222.SP: content with figures?
- 223.TA: not content with figures, I think there area significant areas of doubt

* * *

STONE (Policies Stone 1-2)

Policy Stone 1 (Stone Town) & Policy Stone 2 (West & South of Stone)

224. SP: We will be discussing flooding; Capita Symonds (J6) and then SBC will add all concerns. Mr Heal has said some are in support but the Plan should not be so specific re the WBpark scheme. It would be helpful to know how you feel re leisure centre as opposed to retail use brought about through a supermarket, but is there a need for leisure facilities? There are concerns re location of site SBC claim it is not an allocation that they're just expanding the TC boundary. Also what are the implications on flooding i.e. Nature of the building, the car park, the road highway and off site balancing
225. EA-JF: party to Capita Symonds document; view it as technically viable but without more detail on scale, nature and layout it depends. Any development within the flood plain requires flood risk assessment and development that increased flood risk wouldn't be permitted; we are looking to reduce flood risk. The sequential approach looks to locate

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development in zone 1 flood risk areas before 2 and then 3. In detailed assessments re proposed development we need finished floor levels, details of access i.e. safe and dry and flood resiliency levels. In high risk areas we require flood warning measures and an evacuation plan.

- 226. SP: Re Capita Symonds report – Appendix B
- 227. JF: EA 2010 modelling
- 228. SP: SBC say this is not a site allocation as no specific cite is marked. But we think something will come about at WBpark. Would you expect more detail flood risk assessment in terms if the sequential test?
- 229. EA-JF: Ideally for a sequential test yes, it is more difficult to compare the flood risk considering such high level proposals outlining the location and size of the site.
- 230. SP: would you expect more detail at this stage in the planning process and are you happy with the conclusions of the report?
- 231. EA-JF: a report would outline the flood risk in an area including a technical assessment and would look to a flood risk assessment, considering alternative sites. This area is less vulnerable so if accommodated within zone 2a or 1 and includes adequate design, access and off setting measures then a development would be ok.
- 232. SP: so there are concerns re flood risk/ retail capacity and we'll have a response from SBC.
- 233. DS: we need to distinguish between what is going in the Plan and other activities. We are starting with this Plan, it is a strategic level and has to fulfil strategic principals. The NPPF requires us to define the TC boundary for the next 20 years, based on available evidence. RE retail argument, evidence supports the expansion of TC boundary and the use of the site as retail and leisure. A further sequential test for use and flooding will go ahead when appropriate. It is simply a boundary.
- 234. SP: there are lots of sequential tests here the relevant one is for flood risk. The TC sequential test isn't relevant as now

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that the boundary includes the site within the TC boundary it would not be subject to such scrutiny.

235.OS: yes in terms of TC yes

236.PS: In Stone 63% of population stay for shopping according to a household survey proportional to the age population and spatial distribution of houses.

237.SP: was this for convenience of comparison goods?

238.PS: mostly food shopping, specifically top up shopping was 89% so there could be a level of claw back. Re company averages, we need to benchmark against turnover, i.e note the coop under trades at 29%. D16 table 5.1 shows the coop at the correct levels – reason for underperformance is a spike in national acquisitions. Evidence shows a qualitative need for a store.

239.MK: green infrastructure and green space D34 site is PDL and wrongly identified as green infrastructure p.24 already included FAM 22. Re landscape and visual relevant to specific application and have engaged with EA

240. TM: was the Beattie report commissioned for this plan?

241. SP: have the petitions fed into this Plan?

242. TM: Yes

243. PWD: 6 points:-

1. Dangerous words re what is an allocation FAM 21 TC to be expanded to include WBpark within TC boundary – can only be an allocation and would be a retail site

2.Re TM- Capita Symonds report not part of evidence base only evidence on flood risk D6, though D6 looks at a smaller site closer to the road. J6 looks at different uses and - Capita Symonds were unable to state that the site would be ok for development without further tests

244.SP: For clarity, re appendix A at the front of the road

245.PWD:

3. retail uses re DS said not contrary to WYG

246.SP: clarify – competing retail impact studies don't undertake own capacity analysis?

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247.PWd: 77-96%, 63% in zone 2 para 5.40 – increase market share limits ability to claw back and harmful to trading

4. Green infrastructure – see my statement. D28 – implement MP, evidence talks about impact of WBpark as a green space as it separates Stone from neighbouring town. In 2001 DF agreed SBC said objective for the site was to increase biodiversity and consider possible new leisure facilities, uses which would be consistent, complementary. I object to:

-TC boundary change

-Removal from green infrastructure

-Proposed usage of the site – mixed use is to hide retail proposal

248.TK: Re PS survey yes zone-by-zone assessment though over representation of Stone as there are other areas that are part of zone 2, re quantitative aspect of traffic, car park and the claim that leisure use could only be supported by funding from a supermarket (why people supported the proposal)

249.IF: petition was drawn up in response to this Plan and the proposals don't include a definition of mixed use, we are unanimously against a proposal for retail in the park!

250.SP: was there no 'Beattie' consultation?

251.IF: No

252.JH: note that 'Beattie' hasn't measured the impact today and small local traders may suffer from competition, also concerned that coop won't survive

253.MB: 1. Supermarket isn't needed on this site to fund leisure

2. The Plan re M5/1a – 2.22 re allocation claim that no allocations are being made

3. Pg.66 the Plan existing green infrastructure shows WBpark as green infrastructure

4. WYG no evidence that not used as evidence for claw back and would like opportunity to consider other sites with shuttle bus to TC

5. N5 1a 2.21 – 7th line 'accordingly' – so they can build a supermarket

6. The site area on pg.10 is green

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7. 8 documents support that this area is green infrastructure and that it will be expanded, not fragmented as this proposal will do
- 254.RL: when the plan was published I was reassured as it talked about regenerating the canal. Addressing impact on the canal at planning permission stage isn't encouraging. The canal is a strategic focal point.
- 255.SP: SO J6 covers only a small part of the WBpark site that is now in the TC
- 256.JF: current evidence base supports the redevelopment of some scale and nature. KWP Green - 10 flood risk plans included will guide a detailed flood risk assessment
- 257.AE: EA remit is fluvial flooding and overflow of the canal isn't considered, also accounts for 100 years of climate change, which can help determine final floor levels. Appendix B J6 report was before Capita Symonds determined modelling. Appendix C revised flood zones.
- 258.HW EA to provide copy of latest map of 2010.
- 259.SP:SBC to address what are the implications of the plan and strategy for stone if refer to mixed use development removed?
- 260.DS: hypothetically refer to change of boundary?
- 261.SP: I'm not convinced that evidence is sufficient to change TC boundary other than to increase the capacity of TC for retail and more specifically to include WBpark
- 262.SBC-DS: We looked at three potential areas of expansion considering strategic issues within the scope of this plan.
- 263.SP: why has it taken until recently to move the boundary? There were no representations to the Plan suggesting this between publication and submission of the Plan.
- 264.DS: very complex and we should have done it earlier. It was because the retail study has just been updated, revealing that the TC capacity was insufficient. Not sure re the relevance of the Oct Nov petition as it wasn't within the consultation period of this Plan. This petition was in response to engagement re leisure provision within TC
- 265.RGJ: I have a flood map dated March 2013 and I will forward to Programme Officer

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266.SP: Ok so what happens now? I need to determine if the plan is sound with the modifications of the boundary. I'll write interim conclusions. The main modifications will be subject to a consultation period and if new issues arise these may need further examination.

* * *

Wednesday 30th October

Economy

1. SP: Today we're discussion the economy with policies E1-8
2. N.28 HW – add column to summary table

Policy E1

3. When did it come about and how draw out economic strategy from LEP?
4. RB: July 2013 after plan submission the strategy was based on jobs. UK competition, inward investment and meeting with LEP – the strategy is consistent with the evidence
5. SP: So the strategy came out of the plan?
6. RB: LEP refers to how SDLs, the LP process and the range of empty sites – para 1.2 RB's hearing statement. The plan supports the principals of our economic policies

Policy E2 – sustainable rural development

7. SP: How does this policy work if there are no settlement boundaries? It highlights an extensive area for employment. Is there an issue here in deleting the boundaries? How would E2 be applied?
8. DS: intended to delete residential development boundaries. We do need to think about the area away from the boundaries.
9. HW amend E2 and C5
10. SP: where is the support for the criteria, 'achievement of rural sustainability', which cover more than the area for employment?
11. DS: SP6 is the general policy for rural areas and E2 is basically an economic policy
12. SP: encouraging types of economic activity with a list of uses, is this consistent with the NPPF?
13. DS: Yes
14. SP: the additional set of criteria, are these consistent with the NPPF? Re sustainable use and re-use of rural buildings
15. DS: yes consistent and they have no particular spin

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16. SP: Some reps comment on proportion of bf and gf in rural areas – M59? Is this a modification to the policy?
17. MS: Require clarification re how policies emerge through the Plan. Re list of uses, tourism and renewable energy – para 50 and 59 of NPPF. A site-specific allocation at Trentham Hall would be consistent with policy E2
18. SP: Re industrial estates listed pg.78, setting out the general strategy. M62 changes to type of use expected on estates – adding waste management?
19. RB: Yes
20. SP: Re Hickson airfield – M61 change
21. RB: Yes
22. SP: Ladifeld – what do you want, what changes? Is the plan unsound without these changes?
23. PS: sound with M63 changes – sites are very important for the borough, where 250 people are employed – Stan Rob as the main employer and an ex MOD site so cheaper employment premises and opportunities for entrepreneurialism. Re lorry traffic concerns from parish council but these are A and B roads with less residential frontage. It is a discrete location. The policy refers to local infrastructure requirements but this would depend on the type of employment premises i.e. if the development didn't require special water or energy needs. There are no overriding constraints and happy with changes
24. SP: M63 propose 6 hecs
25. RB: yes, the two areas in red hatch, are these your allocation?
26. PS: allocation to the edge of flood risk area
27. RB: yes the changes are outside the flood plain

Raleigh Hall

28. SP: explain the issues – it is a 6 hectare site, 4.2 usable
29. BM: it is a well-established family run estate, since 1980. It includes two biomass providing electricity. The site is 4.2 hectares – change proposals map to reflect this. We require an expansion of land. We have considered access, wildlife and biodiversity. Re proposed development we would be submitting a planning application short term.

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30. SP: I will do a site visit. What does it burn?
31. AM: 2003 consent – generating 2007 burning clean energy mostly wood chip, locally sourced as well as energy crop producing conventional steam. We are looking to develop 'heat take off', which would make the operation more efficient. The main production goes to the national grid.
32. SP: there are concerns with the local community re access through local villages, how will you address this at an appropriate time?
33. BM: We will fund access to the site E 519. We have an email from county highway who are happy in principle. The route will include A roads – see M14. It is quite an isolated area; it will create jobs and have a minimum impact on neighbours
34. SP: Appendix 3 at the top right and Appendix 1 prison and young offenders
35. AM: Yes this is Drake Hall – we had approached re providing the with energy but just had a new pfi gas boiler fitted
36. SP: when was it built?
37. AM: 2006/7
38. SP: what are the council's views?
39. RB: changes are ok, we consider no impact on the delivery of employment in wider Stafford area
40. SP: does policy say what area of land it is? 8.17? Is there a change there too?
41. HW – not in FAM – is a later change, content that highway is addressed as part of traffic assessment
42. SP: (to RT) What are your general points about the industrial estates?
43. RT: Appreciate you doing a site visit A5150 and A5045 – have site access concerns see statement Re 3.19 for solutions. Policy doesn't consider wider community road network – vehicles go through Great Bridgeford and Eccleshall Road. There are 10-11th vehicle movements per day and 700 HGV movements per day. It is an A road but it is a minor one built in 1930s not for this intensity of use/ volume. The Plan doesn't deal with these wider impacts of the industrial uses. Traffic assessments at

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planning permission stage don't reach wide enough, ¾ miles radius required to address reality of impact.

Policy E5

44. SP: (to MS) PP for major development use B1 and B2, tell us what you want at Methford?
45. MS: welcome policy E5 but would like to improve with regard to national policy. E2 accommodates energy production but not E5? Our proposal is 34.5 hecs site of energy generation, combined cycle gas turbo (gas powered power station). The scheme going to NSIPs includes 6.7 hecs left over for B1 and B2 use
46. SP: So to support your application you require the policy to be more specific than 'infrastructure development'.
47. MS: Yes
48. SP: this is quite a large development in the gb – what is there now?
49. MS: empty buildings to the N, it was a power station
50. Sp: are all 34.5 hecs now classed as PDL?
51. MS: Yes
52. SP: you said you wished to improve the policy, is the Plan unsound without this change?
53. MS: it needs to be consistent with national policy and new energy policy and it would be helpful to have support within the policy framework for energy generation re NSIP assessment
54. SP: what do SBC think about policy including specific reference to Methford?
55. DS: not sure how useful it would be in this plan as it is only a strategic level which doesn't look at individual allocations beyond the purpose of intent. The existing Plan is sound and this examination isn't about making it 'sounder'. Why would power generation be singled out as an allocation? What about adding a definition of economic development?
56. MS: reference to energy generation wouldn't necessarily be an allocation and there are other references in the Plan to strategic uses.

57. DS: national policy-NPPF and energy policy already support the NSIPs application. The plan lacking a definition of economic development doesn't make the plan unsound.

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Policy E6 – tourism

58. SP: should the Plan include a site-specific policy for Trentham gardens?

59. (to MS) what are your reasons for proposing a site specific policy? (to SBC) why do you think the Plan doesn't need this policy, and that it should be left to the SAplan?

60. MS: more has happened on site and we're working with SBC, the old Plan had a site-specific policy, LD19 and 20 – which enables development and restoration of estate and gardens. Trentham Leisure has support from English Heritage but the regeneration isn't complete yet. There are no negatives resulting from this development there are positive impacts enhancing wellbeing so I'm not sure why they are remaining neutral. English heritage also want this policy to be extended into the new Plan. I want to know why it was removed, what was the decision making process? SBC say they didn't see the need for the policy but it is a huge site and it has a wider positive impact. Further, Trentham Hall was a key element to the SoS decision to allow the appeal highlighting the importance of reinstating the Hall. PP has expired, as it was time limited.

61. SP: How many visitors to you get per year?

62. MS: not sure

63. SP: what is on site at the moment?

64. MS: from the entrance there is a garden centre to the right, the hotel to the left, a bowling green, small retail units limited to leisure. Under reserved matters we have permission to extent the retail area.

65. SP: Re policy in GB, it isn't identified as a major site so the development may be restricted by being in the gb so would need to fall under special circumstances.

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66. SP: (to SBC) Why was the policy dopped? Why since the consultation period has is policy no longer appropriate?
67. DS: SAplan will be a more appropriate document to identify it as a significant asset in tourist terms. This plan is just for strategy
68. SP: to think about consistency, Allocating Methford and recognising the industrial estates and not identifying a major tourist site is a matter of judgement re what is a strategic level policy. So You (SBC) wouldn't rule out considering the site in the SAplan.
69. DS: Yes if this is appropriate at the time
70. SP: So Trentham Hall's site-specific policy was appropriate in the old Plan as it was a different type of plan
71. DS: the size of the site doesn't mean it is appropriate for allocation; also consider scale and variety of uses within the site.

Policy E7

72. SP: English waterways have concerns re permanent mooring restrictions
73. PhS: see my statement re tourism policy changed but final version introduced additional condition re permanent moorings. The visual impact of a single residential boat is different to a built residence. Canals compose a variety of residential uses. There can be a variety of ways they can be moored i.e. in marinas or to the side of the canal. Where residential moorings are deemed appropriate they can contribute council tax if legitimized so think that they should be considered on a case-by-case bases. There isn't always an obvious difference between residential and non-residential uses of boats. Also there is no mechanism for enforcement, no definition of 'permanence'. There is a legitimate and unmet need for moorings.
74. SBC-JH: we don't think it's sustainable to allow this development away from key services and we receive complaints re paraphernalia on the foot paths and cars parked up next to

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the boats as well as garden sheds and such associated development to permanent use. Over time this unsustainable use is multiplying. We appreciate the need for residential moorings i.e. over winter. The issue relates to permanent use.

75. SP: how have you handled this in the planning system?

76. JH: it depends on the manner in which it is done and it requires PP where it is as described above

77. PhS: concern re SBC may exacerbate the rate of unofficial residential moorings. This policy isn't consistent with other LPA

78. SP: they are more sustainable within a marina and policy doesn't rule out moorings near key service villages.

79. SP: (to IF) more concerns re retail and WBpark and policy E8?

80. IF: FAM 26/7 consequences of development at WBpark threatening green infrastructure. Questioning the robustness of TC capacity assessment – mostly quantitative, more margin for error – sqm/sales

81. SP: note issues re sequential test, WBpark and moving the TC boundary.

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Policy T1 – sustainable transport system

82. SP: Concern re requiring developers to undertake a transport assessment

83. DS: exceptional circumstances, policy states, 'where appropriate'

84. SP: any conflict between allocated land uses and current proposed route of HS2?

85. DS: No

86. RT: 4 points: 1. Recognise employment estates Ladford and Raleigh Hall requiring infrastructure improvements at access. Junction 14 of M6 and A5013. How far does a transport impact assessment reach?

2. Staff W new road junction Doxley road to A34 has big delays, concern re no worked example of how the junction will work

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3. 'Integrated transport strategy' - park and ride and bus priority lanes have no support
 4. NE and W – no integrate transport solution and where two schemes will bring traffic in and won't take it back out
 5. 2008/9 SCC say that there were only 11 occasions where motorway congestion led traffic to divert through the TC
87. SP: Not here to analyse the integrated transport strategy but would RT's wider network issues be exacerbated if there was more development? i.e. motorway of highway maintenance issues?
88. SCC?-ND: transport assessment requirements limit HGVs and weight restrictions but these are appropriate roads for these vehicles A and B roads
Staff W- capacity for traffic signals and residual issues on A34
Park and ride at Redhill – business case
HGV parking to N is best as lorries aren't compatible with business park
Bus priority lanes aren't a priority
Re motorway stops, there were 11 cases where people thought it more appropriate to cut through the TC
89. RT: Yes they are A roads but not like the A34, they're not strong enough. Re rerouting, the traffic wants to get to the M6 so they use crewel grove and A50
90. SP: Parking policy T2, where did the standards come from?
91. JH: FAM 42 – changed maximum to minimum in line with government policy
92. SP: re Stone SDL, what is the proportion of infrastructure and how will it be delivered? Issue re extended allocation? Re phasing post 2021 (regeneration strategy) – may require HW to know more about this; Re alternative sites – Mr Bell and Mr Sharpe; SDLs to S and W of Stone – 500 dwellings, 18 hecs of employment
93. MK: M57 Natural England – Cannock Chase SAC
94. SP: within 15km of zone of influence
95. MK: Yes and M58 to Xib) water issues

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96. JF: Severn Trent Water
97. SP: How does SDL fit into strategy?
98. MK: 500 to W and more sustainable area for development. To the N is GB, to the E is the train line and to the W, proximity to schools
99. SP: were these sites properly assessed and reasoned?
100. MK: yes
101. SP: viable and deliverable?
102. MK Yes, SCG see E98
103. SP: ok let's concentrate on areas of disagreement. Extend area from 18 to 34 hectares. Hallam Land tell us about the land involved, doubling the allocation.
104. SP: the planning application covers a larger area see R66 for plan modifications. M52 – add school to boundary
105. SP: (to SBC) will you decrease area of allocation to align with the policy map?
106. SS: we've not reached agreement on the appropriate scale and form i.e. hydrology, landscape and visual analysis, there is an environmentally sensitive area immediately to the W. Intending to develop 17 of 33 hectares
107. SP: Is there a reasonable prospect to bring the site forward? Can the site fit 500 dwellings?
108. SS: we want to take a sensitive approach
109. SP: if facilities are not within the red line, SANGs need to be close
110. SS: we are looking to integrate the facilities and green space to make the development attractive to the market
111. SP: (to SBC) do you support the allocation? Would you like to see a school extension, community park, open space
112. DS: facilities could be provided off site to increase the density, we're nearly at agreement re strategy
113. HW to draw up precise boundary
114. SP: how will you meet additional need for school capacity? Is this essential to provide or a wish list?
115. JJ: yes WE require greater capacity
116. SP: Re need for development in Stone?
117. DS: yes potentially to be 500, an oversupply

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- 118.SP: moratorium? Is over supply significant in the big picture?
- 119.HW provide SHLA maps by settlement – online and difficult to access
- 120.SP: what's the situation re the employment element? – 18 hecs
- 121.MK: SDL to S- extension to Stone business park
- 122.SP: interest from developers? Do you see it as deliverable?
- 123.TM: discussion with landowner. It is an extension of existing business area and SCC re access, it is a natural extension and there are few constraints
- 124.SP: (to MB) Is it near your site?
- 125.MB: yes, clarify re policy 2, does the employment have to come with housing?
- 126.SP: MP to be submitted before PP granted.
- 127.DS: Yes we want to MP for a comprehensive design and layout
- 128.SP: it is two separate sites?
- 129.DS: yes
- 130.SP: is there a condition of occupation?
- 131.DS: no
- 132.SP: an additional issue re phasing due to impact on Stoke-on-Trent and Newcastle (the potteries) regeneration strategies. SoT (Stoke) M5/10a – I'd like to see the evidence of impact.
- 133.DS: 3.32/ 3.42 promoting Staff to prioritise so hold back Stone
- 134.SP: 3.38 will this undermine the balance of development on SP4? Early release of Stone SDR to Staff TC, but you say Stone has a strong housing market – is there a lead of logic here?
- 135.DS: bigger market in Stone, finite space compared with Staff. Re potteries we have signed a pro forma

* * *

- 136.SP: does K2 include office use?
- 137.MB: it doesn't mention employment and I think Stone needs to bring together employment and transport. 7.12 link
- 138.SP: E98 landholders?
- 139.MK: Weavers and Delice de France

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- 140.MB: can't say when it'll come forward
- 141.SP: Re 2001 phasing and the overall impact on SDLs? i.e moratorium
- 142.RE: concern re schooling and holding back housing. Barliston – 400 units and catchment area of Stone and populated to increase
- 143.SP: not directly relevant to this Plan, for Education Authority
- 144.AM: to discuss Wedgewood site with Stoke as SoT require additional schools delay D53 and D53a yet no delay in tables
- 145.SP: agree your concerns
- 146.SS: not sure how Staff's plan for Stone can prejudice potteries bf regeneration. Staff has needs for quality housing. SoT didn't object to PP for 250 houses in Yarnfield on bf, which is closer to their boarder than Stone. Is this because they have no evidence?
- 147.SP: suggest SBC meet with potteries to discuss and get evidence for impact

Alternative sites

- 148.JT: recognise that SDL required to be more than 500 dwellings but where from? Add our 100 to the 500. This new red line would make more sense re the lay of the land, it'll have minimum impact on the landscape and complies with policy4. See the appendix to our evidence for landscape assessment
- 149.SP: SBC why extension to N and not to S?
- 150.JT: Stone is growing, potential for 600 houses
- 151.SP: (to TB) HW to submit your plan
- 152.TB: think SBC should have considered a gb review. My site is within the gb to the NW so considered unsound. It has good access; it is contained by the A34. It is 3.27 hecs and the plan is for 92 dwellings
- 153.SP: (to PS) HW to submit map
- 154.PS: My site is E of Stone, 6 hectares of 100 units. A number of smaller sits would be more appropriate for Stone, as Stone Policy 1 says it is looking for a range of development locations. Document E81 pg.21 summary para 5.2 – within zone 2 require less impact on the historic environment. This site isn't

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in the GB and there are no constraints from previous development

- 155.MB: This land is carved by A34 includes ten sites but only 3 coming forward for development [identifying land on maps in Plan pg66].
- 156.SP: concerns re evidence base justifying SDL (to PS and JT)
How did you assess and justify choice of sites?
- 157.DS: starting with strategy document. A site of 100 dwellings cannot be considered a strategic allocation. See G6 document for issues and options. We are adamant we don't need GB sites. Evidence shows that this is the best SDL site. If we require a larger allocation we may add the 100 dwellings proposal. Re employment the scale is appropriate to the size of the town and we're not hearing a requirement for more employment land. We don't know where to expand until we go through the site allocation process.
- 158.HW for SBC to explain why MB's sites were excluded
- 159.PS: SBC haven't answered my question re how the sites were selected?
- 160.DS: in the current context the evidence identifies this SDL as the best. There are minor changes to the footprint. We may require more capacity
- 161.SP: I don't want SBC to make hasty decisions re an extension to this SDL
- 162.DS: we have considered it before and we don't want it to now extend the examination

* * *

Thursday 31st October

Communities

1. SP: The main issues are affordable housing, gypsies and travellers and the settlement hierarchy

HW for SBC policy E8 – TC

Changes – FAM 26/27 threshold of 500 – 300 would like more information re justification for lowering figure

HW for SBC re SCG for W SDL – agreed historic environment figures, noted item 2 and 3, castled development would decrease in density closer to the castle. Considering this lower density, can you confirm that 2,200 dwellings are still deliverable here? See Mr Campbell

2. DS: we have accounted for this
3. SP: C1 types and sizes not rep issues. My question is re M72 – changed homes to have a minimum of 3 habitable rooms, what is the justification? When building, you may require a mix of homes for example to accommodate for 'starters' through providing apartments for example.
4. DS: para 2.7 there will be a mix
5. SP: 3 habitable rooms doesn't include a kitchen, it would need a lounge and 2 bedrooms to meet the standard. Have you considered bedroom tax?
6. UB: 'Happy Report' concerns old people and layout requirements for future proofing. Have considered the spare room subsidies.
7. SP: so this report focuses on elderly needs
8. SL: I find it too prescriptive
9. MS: I can think of developments in Telford including 30 bungalows that wouldn't meet those criteria. This policy change is specific to the elderly – require evidence. The market can determine these details. Mix to discuss with SBC i.e private, affordable.

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10. SP: are other LPAs recognising this report and adopting similar policies?
11. SG: there are no reps on this policy but it is too onerous, never seen a policy like this.
12. SP: What will be the impact of this policy? Does the SHMAA identify that there is no need for 1 bed properties?
13. DS: The SHMAA was fundamental to this change, based on local circumstances.

Policy C2

14. SP: Target 30/ 40% affordable and we heard earlier that the need is 210/year. Gladmans – 234 can you confirm? And last week we talked about how to meet the objective need for affordable housing not through market housing and that there are regular providers of 100% affordable housing. Other issues re threshold 0.4hecs – 12 dwellings/ 0.1 hecs – 3 dwellings. NPPF required evidence base and that policy should include way to negotiate the number down to make the development viable, where otherwise it wouldn't be. In the past Staff E has been successful achieving 30% but other areas not so. Any FAM changes?
15. DS: FAM29 re cost thresholds
16. SP: Is the correct figure 234 or 210?
17. MB: 210 is the objectively assessed need
18. SP: can you comment on past delivery?
19. DS: 589 over 10 years
20. SP: and what are the critical concerns from industry?
21. SG: principal concern is that is out of date as it pre-dates the NPPF. Require a holistic approach. Have the SDLs and whole plan been covered by the viability assessment? Concern re cost implications of policy, consider that the bar is too high and so if every site is negotiated down sites will cost more and their delivery will be delayed.
22. UB: affordable levels can be achieved. There are 6 sites where they weren't negotiated down from 30% so it is viable.
23. SP: where are you in the market?
24. UB: a housing association delivering 100% affordable homes

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25. SP: Social housing only or can anyone access?
26. UB: We do more than 20% shared equity or ownership.
Sometimes we open to the market if required
27. SP: do your schemes attract government subsidies?
28. UB: under developer led it isn't required for rural exception sites we rely on grant HCA in rural priority areas. Sometime we deliver the development ourselves with government grants.
29. SP: how many dwellings per year in Staff?
30. UB: about 40/year, 100 are coming through now...they take time with intensive consultations with local community. Also we tend to uncover a hidden need
31. SP: There are two issues for SBC: the reliability and robustness of evidence
32. JH: We're not solely reliant on the 30%, there are 25 RSLs and 19 housing associations

33. SP: what about past records?
34. JH: re % from market led, only 2 sites didn't provide affordable housing, but Stafford and Stone and other key service areas are accommodating 30%
35. SP: I'd like these statistics. So the affordable housing is delivered through the market?
36. JH: HB13 list has the problem that 349 aren't immune to S.106 requirements. 201 or 301 houses are more viable so there is more capacity to make up the affordable housing. Reserved matters for 250 houses don't override requirement for a viability assessment so it has potential for affordable housing contributions
37. SP: E Staff achieved 30%?
38. JH: Yes from public transport and highway provision

39. SP: (to GV) we've heard some criticism re the date of the evidence, what are the implications of the date of the research for justifying the proportions and targets set out in the Plan?
40. GV: Yes I agree but viability assessments are always a snapshot in time, which has to guide us through the life of the Plan. LEVEL was an unusual assessment on the bases that it

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developed periodically forward costs which are projections not predictions. These allow for an element of bill cost inflation and for CfSHs zero carbon agreement. There are major cost implication projections re values assessed to be 0/1/2/3%, allowing fro CfSHs and baseline costs. See D11 results for D10. Re Staff TC values were first approximate validities pg 11 fig 13 shows the shape of the results.

41. The more you project into the future, the less reliable the data becomes so we took 4 land values – ST18/9 sector.

42. 50 dwellings on 3.3 hectares with less than 20 dwellings/ hectare

43. Assessed about 60/ year 15 ½ thousand units. Sustainable cost of £650/units including lifetime homes standards

44. 30% affordable – intermediate housing with lower value estimate of £350/hect showing good viability 2010 to 2012. For 2013 the figures are in yellow where the secondary test wasn't met. Re existing use value there are some concerns re CfSHs constraining viability. We have assessed bill cost inflation which has proportionally inflated but we're not clairvoyant, code level 3 and carbon reduction techniques were built in at a rate of £50/sqm but code level 4 increased this rate to £100/sqm. We considered social renting not affordable renting so suggest that figures are still representative and housing plus backs this up with their experience. [Explaining expected variations in practice] Baseline bill cost would increase in higher value areas. Carbon standards would decrease, as they'd probably be offset. Affordable housing would increase a little, Staff context and for social rent areas. Good practice post Harman (LHDG, 2012) doesn't include government grants or S.106 [check] Yet, 90% of affordable homes projects received £10 to 15th /unit.

45. SP: What about land values? What's likely to happen since you reported those conclusions?

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46. GV: With more development concentrated within the SDLs, which are low value and/or agricultural land uses, £200th/hec is the default consensus and used as the baseline figure. Modelling assumes land values increase to a higher value threshold. So on 1% property values would assume 2% pay on land to bring value forward. So we have assessed the total quantum re SDLs.
47. UB: affordable housing increases competition to secure paying 10% than a year ago.
48. SP: (to SG) HBF assessment isn't your own can you justify levels proposed?
49. SG: We're still unsure - bill costs have increased, N and W SDLs as the table shows the original viability was £731/sqm June 2013, while BCIS figures are £820/sqm, which is an increase of £90/sqm; but we're not sure how that relates to the use of original inflation rates. I disagree with 650/sqm figure. Other costs in the Plan – SUDS/SANGS aren't updated and not known. The viability for SDLs is updated but I have concern with the other sites.
50. SP: That's something I'll have to take a view on...
51. GV: Re SDLs viability see table 731sqm includes local cost figures. For various costs of housing see the general index re date and location. Discrepancies are Staff 101 compared to the county with 96. D11 document focuses on Staff borough – Others focus on the SDLs.
52. SP: Having looked at criticism, do you consider anything unreliable?
53. GV: no it is to within the margin of error

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Policy C5

54. SP: (to MS and SL) what are your critical concerns?
55. SL: rural exception sites and C5

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56. SP: highlight that C3 specialist housing (elderly) isn't significant – 954 units and 200 provided. NPPF doesn't require this
57. DS: no additional comments to statement
58. SP: C5 provides the framework to consider the residential proposals outside settlement hierarchy.
59. DS: we were asked to consider the wording relating to the settlement boundaries currently proposed to replace (SP7) with settlements in SP3, a similar approach to E2
60. SP: let me know working in due course and consider criteria
61. SP: (to MS) how would the policy be applied to the GB ie settlements or infills?
62. MS: potentially both, N2.9 – Trentham gardens is in this category
63. SP: where do you see Trentham gardens in the hierarchy?
64. MS: Park drive has houses etc so it is a small village. Core doc E77 pg.40 – Trentham conservation area and listed buildings. How can we deal with the refurbishment and re use of the redundant buildings, no.12 park drive and re-build the Hall as 4* hotel? I'm struggling with the relationship between C5 and the text at 11.7, as the site is outside the settlement hierarchy. The 4th bullet point refers to infill development, is Trentham hall a village? If not, I need to look at the 5th bullet point. So if I can't meet C5- para 89 NPPF? Concern re para 89 and 210-213
65. SP: specific points for Trentham – what is the policy framework to be met?
66. DS: the link is SP7 pg.33 at 11.7
67. SP: Does C5 apply to GB?
68. DS: it applies to some of the GB, if outside settlement hierarchy look to read the policies together – SP7 and C5 criteria
69. MS: I can't meet these policy requirements
70. SP: The policy layers are complex, would Ms like to suggest some wording if that's ok with DS?
71. DS: ok

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72. JH: but if we make development ok outside settlement hierarchy the policy wouldn't comply with NPPF – para 89
73. MS: re conversions and the Hall, potentially to be residential use so the policy context requires reading C5 and para 89. Looking at SP7 I don't know where to go. Two main points: 1. I don't recognise para 89 in C5 2. Looking at C5 where do I fit as I don't comply. The main point is that it is a unique site and is very important for tourism and as an heritage asset.
74. SP: have you demonstrated exceptional circumstances before? National policy still overlays and you're in the GB.
75. MS: yes it has fallen under exceptional circumstances before but we had a site specific policy to support it
76. SP: are there opportunities regarding rural exception sites and fundamental concerns?
77. SL: C5 and SP7
78. Para 54 NPPF requires a flexible approach. Only considering 100% affordable housing but how are partly affordable housing applied? We need to retain young people and develop rural services. I think there's been a missed opportunity for crossed subsidies
79. SP: requires evidence re para 54 and ½ market/ affordable houses
80. DS: this has been accounted for in the plan re settlement hierarchies in rural areas. There's been substantial development in rural areas so context is considered in the policies through scattered key service villages
81. SP: consider market housing – strategy is to direct development towards the highest order settlements
82. DS: where there is evidence of opportunities for adequate provision of market housing there may be scope to deliver affordable housing, if the site isn't outside settlement areas

Policy C6 - Gypsies and Travellers (G and T)

83. SP: meeting national policy, required considering cross boundary implications of G and T allocations. SBC to open on

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C6 but first there are three questions: 1. in preparing plan, why didn't you update the G and T Area Assessment (GTAA) 2. SBC claim you have engaged with your neighbours but you haven't agreed. 3. How is the latest GTAA different from previous joint assessment? And have you undertaken more studies between your joint one and your individual newest study?

84. MK: we offered a joint study but it didn't match their production timetable and we also offered them to make comment on our study. We think we have provided a robust G and T provision
85. TM: joint study was 2006 data and produced in 2007 so evidence was out-dated. See F2 consider producing cross authority study as 1. Communities don't respect authority boundaries 2. Para 9 NPPF (trading needs). The original GTAA has been providing current provision and communities very discreet. The joint assessment preceded the NPPF and neighbourhood plans for G and T sites so it was imperative to undertake a new study.
86. SP: F3 'West midlands regional spatial strategy' (WMRSS) 2010. Though RSS is revoked we can make use of the evidence base (NPPF, para 218). I notice you haven't referred to this document, how relevant is it do you think?
87. DS: we have a more updated document now and the WMRSS was based on the old GTAA
88. SP: what is your position (to the potteries) re claim that you declined SBCs offer to do a joint study?
89. N'castle HB: It is logged in the minutes of our meetings that we said yes, we can supply these (HW). We obviously have a history of collaborative working (between each other). The decision to update the study has been through the planning cabinet and we have the funding in place.
90. SP: are you aware of this WMRSS?
91. N'castle HB: I had forgotten but I expect we use it for the last study
92. SP: What about the memorandum signed by SoT and N'castle?

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93. N'castle HB: it was part of the protocol two individual ones were signed summarising the discussion points in the DtC (duty to cooperate).
94. SP: Are there common cross boundary issues? What are the strategic priorities? Are you actively undertaking the process, is it on going? With a joint development plan do you have a policy statement that requires you do undertake a joint GTAA?
95. N'castle HB: para 8 states that we 'should consider'
96. SP: so you don't have to?
97. N'castle HB: para 6 says 'should cooperate and work collaboratively'. Our real concern is that we haven't had the opportunity to participate; we didn't know it was going on and when preparing our rep for this Plan, the GTAA wasn't available. It isn't clear when this document was published so in summary 1. We were denied the opportunity to prepare evidence together and 2. We weren't able, at the appropriate time, to review this evidence. When in February was this document published? We are concerned that there are transient needs to be met.
98. SoT ES: Concur with HB; we have a commitment to update the GTAA. Our update will potentially be impaired by SBCs, especially regarding their method and that cross boundary issues weren't considered.
99. SP: Some may say that M75 is a major modification as opposed to minor. So (to the potteries) what do you want me to recommend to SBC? You're saying SBC's method was flawed and that they haven't satisfied national policy. Are you saying this policy is unsound? If so, do you have any solutions?
100. HB: To be sound I think C6 needs to be based on robust evidence and be collaboratively prepared accounting for transient needs.
101. SP: what is the implication for this Plan re soundness/ how can it be improved? How long would you say it would take to do a GTAA together? i.e. what about councillors?
102. HB: this is most regrettable
103. ET: it took 1 year for the previous assessment but we did a temporal analysis through summer and winter

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104.SP: we can only suspend the examination for 6 months maximum. Please talk over lunch to discuss additional implications and understand your concerns. I don't want to get into allegations; they're not helpful at this point.

105.TM: yes we'll talk

* * *

Policy C8 and accompanying text

106.SP: what is your stance?

107.HB: we're keen to cooperate and have agreed in principal to review the wording to commit to a timescale to undertake a joint update to the GTAA

108.SP: remind me. What about the policy is unsound?

109.ET: the evidence wasn't jointly produced, don't agree with the method, there is no transit provision, though 86% need has been identified, the report claims that there have been no illegal encampments in Stafford – SoT have had 35 since January this year and there was no identification of bricks and mortar to provide households in need.

110.SP: remind me what is the most up to date guidance on GT assessments?

111.ET: *Gypsy and Traveller Accommodation Needs Assessments* (DCLG, 2007). NPPF just requires 'robust local evidence'.

112.SP: I am concerned with M75 and its evidence

113.SBC HW to provide a rebuttal to criticisms of their GTAA

114.Why do gypsy sites have to provide suitable recycling?

115.MK: our waste strategy promotes recycling

116.SP: why has this been specifically highlighted for gypsy sites?
N2 already provides for this requirement.

117.MK: Shall we review this as part of the wider rethink of C6?

118.SP: Yes, C7 has no issues

Environment

119.SP: Indigo planning has withdrawn their statement relating to matter 9. From Cannock Chase and Litchfield I have learns re SACs. N1 – design, character, low carbon, renewable energy. How did policies come about? And How do they impinge

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development? Building standards are a movable feast. Are the policies too onerous?

120.DS: The policies aren't an overburden, they are aspirational

121.SP: re changes – minor and of substance – are there any FAMs?

122.DS: FAM 32 relating to policy N2, it is a more general policy relating to zero carbon

123.SP: was CfSHs? Now BREEAM standard

124.HBF-SG: N1 isn't to be a best practice guide; it refers to Building for Life (BFL) and safety by design (SbD). N2 requires building regulations and concern re all development requiring on site renewable energy, which doesn't align with the latest government thinking. I have no concerns re N3

125.CC: agree with standards for climate change and increasing building quality. Concern re N2's longevity as government is undertaking its red tape challenge – housing standards review – see J documents.

126.New thinking is that there should be a clear break between building regulations (BRs) and planning. So FAM 23 is unnecessary.

127.Re N1 and BfL – concern re, what is compliance? Red and green marks – what if you get one red?

128.SP: tension between codes and standards and national policy.

129.MS: I commend the change allowing a practical viability test re meeting BREEAM at 1,1001 sqm

130.SP: yes re rebuilding trentham hall to modern standards. (to SBC) after government consultation standards could change what is your view such concerns?

131.DS: it's about creating a balance, which we think we have achieved. BRs depend comprehensive plan sit in context we think reasonable level viability is a concern the standards do have cumulative effect how you dealt with overall viability?

132.SP: yes (to GV) what is in your assessment? What about consultation about zero carbon homes? Is there guidance about allowable solutions? What if BfL went? Government is drawing back on CfSHs. How can you implement this policy if

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the government withdraws? It is complex to identify all the standards and codes?

- 133.GV: viability assessments are very much a point in time. As standards increase, cost implications increase.

Cost implications of CfSHs	
£ Cost/ sqm	Level
43	4
109	5
335	6

DLEs figures for CLGs [look up]

BRs are to be extended to 2016. An assessment of costs suggests that while the total figure, if for best practice is vague as collection of allowable solutions means radically different costs.

There are uncertainties around what should be included in costing. This depends on the type of unit, the type of land and solutions, as well as the rebased baseline figures. So, it isn't easy to produce a single figure. £25,000/unit; with no evidence that it would be greater, and some that it could be lower.

Zero carbon standards could potentially lead to great costs but this is a nationwide problem.

- 134.SP: Harman's report (LHDG, 2012) and NPPF – 'economic viability of all requirements in the Plan'. (to HBF) are your concerns about the discretionary nature of assessment allayed?
- 135.CC: I don't disagree; we need more flexibility in the Plan to bring down prices associated with meeting these standards. For developers, it is the fabric of the building that comes first, insulation etc. so that the building consumes less energy in the

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first place. Yet this policy requires on site renewable energy production – this would exceed requirements code level 5 isn't implemented yet. Re part 2 of the policy requiring 'maximum solar gain' is a bit too prescriptive. This may be appropriate but it depend what the building is used for. On commercial buildings this is a normal approach to construction.

136.SP: Look at N2 to the second para (requiring on site RE)– to Taylor Wimpey what does this mean in practice?

137.CC: encouraging solar water heating, air source heat pumps, potentially biomass boilers

138.SP: for 2,000 houses...

139.CC: I'd focus on the words 'a proportion', it isn't clear, we could provide any level of proportion, this would cause concerns with our viability testing

140.SP: would this type of scheme be required to meet other regulations anyway?

141.CC: yes on site RE would be required

142.SG [questioning compliance with BfL 12 how it was viability tested]

143.SP: were they considered?

144.GV: figures by Scottish housing association Habitaie (sp?), some features £600/home

145.SG: I think 1500

146.GV: not all for SbD, presume BCIS – costing/layout standard

147.SP: D52 rep?

148.GV: D51 original viability study look at D52 new document post publication authors aware of Harman report – pg7 what was included

149.SP: conclusions pg.19 consider these factors plan is viable though there are significant challenges to delivering the SDLs these are common to all sites

150.SG: don't agree with SBC requiring builders to get SbD accreditation, means additional costs

Policy N3

151.SP: There is concern re landscape and the impact on local community pg.105 map. I require more information here

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152.DS: it isn't prescriptive and doesn't preclude others

153.SP: Ok

Policy N4 natural green infrastructure

154.SP/AM: all ok

Policy N5 – some minor modifications, partly from natural England

155.AM: no issues

Policy N6 – Cannock chase

156.SP: Ensure consistency with natural England. Where are we now re Cannock chase SAC? Consistent with neighbours, how did you get here, any changes to the policy map? Majority of SAC mostly in Stafford and CChase

157.MK: propose mod A27 to N6 natural England agree. 15km buffer – update policy map J36

158.SP: is the policy working similar to Cannock Chase's?

159.MK: Yes

160.SP: is it materially different?

161.MK: it doesn't refer to 15km in their supportive text but it does in ours

162.MK: see M96, natural England

163.SP: FAM 35

164.MK; yes and M35 and M36 – map

165.SP: what about an interim policy change? SPD re contributions?

166.MK: the interim guidance is currently being progressed

167.SP: mitigation for birds, why has CChase designed as SAC, SAC is open access? Is this unsound?

168.CC: no doubt that SAC is vulnerable but I have concern re the evidence and footprint ecology i.e 10% increase in housing 15% visitors, population is aging, it could change re LPA may have no control.

169.SP: (to AM) CChase SAC to mitigate impact, what do you have to report?

170.AM: difference between evidence and the partnership ie how to inform mitigation measures? The evidence base was prepared

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as project was evolving up to now. It is important to appreciate the difference between authority approaches as they are managing different, specific issues.

171.SP: Happy with approach as amended. Discussing SANGs (last) Friday – your J doc latter on SANG said they had to be provided on site? Or is adjoining land ok?

172.AM: they don't have to be provided within the red line

* * *

173.SP: let's hear from CC re Taylor Wimpey/ Bellway's concerns

174.CC: the penultimate para requires measures are secured 'prior to approval', through S106 and CIL so a bit clumsy

175.SP: read as before development but S.106 may prevent occupation of dwellings as additional people are a threat to the SAC

176.CC: read as 'before issued permission'

177.SP: Mitigation measures are in place

178.JH: no secured provide setting out area of land and contributions so far CEG signed one financial contribution for land

179.SP: think by agreement

180.JH: yes that's what we thought

181.SP: there are no changes to the text M96 – natural England HW to tweak the wording. Is there a need for the policy, considering national policy?

182.MK: For ecological footprint, to guide mitigation and avoid impact on the SAC Natural England may change its tact but the policy is flexible and has an associated SPD. South Staff also have a supplementary document so we think this is suitable

183.SP: (to CC) do you have concern re SANGs?

184.CC: I disagree with measures to mitigate as I think we can improve access without providing on site

185.SP: pre penultimate clause there is insufficient evidence to justify the approach to SANGs

186.CC: yes

187.MK: I have nothing more to say

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- 188.SP: nothing for ADND, N7, AONB (have been addressed in SBCs statement, do we know if CChase partnership is happy with M98?
- 189.DS: All ok
- 190.SP: got DtC protocol? Not sure will check
- 191.AY: not protocol but have agreement re minor changes to policy by email and including initial questions
- 192.SP: I'll dig it out...
- 193.English Heritage declined their invitation to attend re Policy N8.
- 194.There is only one issue re need for site-specific policy for Trentham gardens (TH). N8 is very important for TH. Do you think these policies are more restrictive? Woodland, biodiversity, biological importance, TPOs, listed buildings (LBs) buildings at risk – are you alone dealing with all this?
- 195.MS: We have English heritage support
- 196.SP: DS is balancing between local aspirations of Stafford, satisfying the NPPF and not overly burdening development
- 197.MS: See staff borough doc E77 – evidence 2012 to Jan 2013. Estimate employment at 6-700 people, courtyard pg.45, Hall pg.68, and cottages pg.72. S.8 pg 81 – there are 16 issues to address, 9 series of actions and 14 actions 'attention to buildings at risk'. The outline permission has lapsed. The amount of enabling development was previously calculated on figures in 1999. Natural environment - pg.96/97. In total there are 19 policies to comply with. We require a site-specific policy, which English Heritage support. It would allow all the concerns to be wrapped up together and support us at appeal if required to justify special circumstances [all page numbers refer to the Plan].
- 198.DS: I have sympathy and want to help but don't think this is vehicle for it, it is just a strategic plan. Look at the uses are they in line with GB? We'd need too much detail to consider the policy (to avoid it being a carte blanche for all development) than is appropriate at this stage of the Plan so more appropriate for the SAdpd. English Heritage are comfortable with the SS policy in the dpd.

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- 199.SP: is the email from A Taylor? M96D – they supported the site specific policy being in the Plan on 14th Oct 2013-11-08 DS this email was from Rohan Tokiolson
- 200.SP: in response to a leading question from you? Please submit this email. HW
- 201.SP: I will think about this. Would the site-specific policy trump the others?
- 202.JH: no we would consider all, it's a balancing exercise
- 203.SP: tomorrow is infrastructure delivery policy – look at outstanding HW, compile a final list and consider a deadline. Consider whether some of the changes are major. I'd like an audit trail and for you to refresh the numbering.

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Friday 1st November

Infrastructure

1. SP: Introduction including summary of yesterday. Re AMR C1 pg.35 para 10.9, you indicate the number of affordable houses completed through market provisions/ by housing associations?
2. DS: We have a time series in there but it isn't a simple question. 210/year for the proportion of market housing i.e 30/40% through S.106; HW to verify and include number of specialist providers including rural exception sites
3. SP: The NPPF wants to know how your going to meet your objectively assessed need for affordable housing?
4. DS: most commonly it's a partnership with RSL
5. SP: So figures e.g Bromford would come from figures not managed by you
6. CC: LPAs tend to not like
7. SP: what is your experience?
8. CC: Stafford W long term incremental managing open space, most likely RSL
9. SP: leave HW for now
Vital infrastructure for implementing the Plan's SDLs for robust infrastructure delivery policy
AM have MS – St Modwen
Highlight main points
SBC into policy – how, where come from some changes especially at end of chapter re 13.24
Costs are a movable feast figures to be confirmed understand detail of schemes and how they vary over time. Is tbc a 'cop out'? What is the scale of finance? Can you introduce and help us with the table about critical infrastructure. Are there too many 'tbc's? Do you have an idea of the cost of schemes?
10. DS: The infrastructure delivery mechanism is in place to coordinate growth. There is a link between the infrastructure

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delivery plan and policy I1. The summary table shows the key ingredients for the delivery of the plan. At a strategic level it is difficult to be comprehensive. Yes 'tbc's can undermine the table but we have what is critically important

11. SP: GV's viability assessments require hard figures – what are the costs for the infrastructure. Is this the latest table (13.24) for highway, pedestrian and cycling provisions to cover Ner, W and E access improvement areas?
12. DS: Yes
13. SP: the calculation of the SDLs must have required figures or a range?
14. GV: SDLs are due to deliver more infrastructure - to calculate we use the most available figures -w'ern identification of costs before discounts and before tbc's £20th/unit for infrastructure – land costs left out but we don't think they're huge – we identify costs at 45mil with 20th/unit – to this we add other data and some costs not just for the developer i.e primary healthcare and education charges –promoters to SDLS what figures are they using? – we tested above 20th/unit
15. SP: do you have hard figures for access improvement schemes
16. GV: used the £20th for overall figure, which we think is a conservative view
17. SP: yes, looking at 13.24 and infrastructure highway to appendix D Stafford TC 7.3mil...for Stone transport costs are not available? What is the relationship between tables?
18. DS: Appendix D SDLs gaps distribute wide, school put in minimum figs?
19. SP: 13.24 public transport, green infrastructure, telecoms unknown. What is the value of the table with so many gaps?
20. DS: an overall evaluation can be made, maybe it is an issue of presentation? We are doing our best as part of the overall evaluation
21. SP: How can you be sure the plan is viable with the gaps?
22. DS: the analysis was made based on figures not in the table, the table is about what is precisely kown.

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23. SP: IDP D57 – table indicating terms of infrastructure some estimated costs it is a living document
24. DS: we are trying to integrate IDP with the plan but it is difficult to bridge the gaps
25. SP: highways pg.54 at 8.4
26. DS: the figures are proposed to be replaced with tbc
27. SP: (to SCC) you have to have a balance between specific and flexible, we have seen the changes to 13.24 and appendix D re what contributions are going to the extension.
28. SCC: received 35mil removed tbc combine costs of highway infrastructure sustainable transport by SDLs 35 mil not right could be double i.e delivery of the new bus service over 5 years will be £1mil
29. SP: what figures were used for GVs viability study?
30. DS: we didn't make up £35mil, it was critical for the overall conclusion. We had to determine what is critical to deliver The Planning Inspectorate SP: what about leaving the table to appendix D as it tells us little naming it 'other critical infrastructure costs'. SCC are saying the costs could double
31. GV: 70 mil for new significant infrastructure provision Yes X could benefit the borough, but are they critical? The figs in the table are the best available and provide headroom to assess what is not to be provided. We are dealing with uncertainty positively to provide a future check and determine how to distribute non-critical infrastructure. This allows us to weigh up unknown aspects and relative desirability, a way to discuss cost elements
32. SP: The table isn't as helpful as it could be do you need it? Put it in Appendix D?
33. DS: We could include a text summarising the table
34. SP: yes perhaps a paragraph that refers to appendix D and IDL... I'll leave you to think about it
35. DS: we'll demonstrate a range of things if necessary for soundness
36. SP: re soundness effectiveness not funded what is highway etc so long trying to be helpful concern re table and have chapter to appendix view?

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37. CC: re 13.24 and the costs underlying the viability assessment, what are the implication costs to development?
Re Seven Trent and charges to householders we have a confused picture, it isn't helpful
38. MS: agree with CC's concern, we don't need 13.24
39. RT: for the lay reader it is difficult to understand i.e. community buy-in and confidence re what will be delivered. The master plans will help.
40. SP: (to SBC) what are you going to do, if anything?
41. DS: 13.23 – para 13.24 is more similar and can include costs to appendix D
42. DS: no adverse consequences to including the para in the Plan, it isn't critical to the Plan
43. SP: HW review text at 13.24 and its relationship with Appendix D
44. (to CC) What are your concerns re your rep for I1? You say you want to delete the second sentence and additional text?
45. CC: no change to I1 my point is re master plans
46. SP: we'll return to that
47. MS: reps policy E5 MDL former Methford power station NSIP application Appendix D electric is critical, re government policies and EN1 – important energy project para 1.4.1/ 2.12/ 2.2/ 2.22/ 2.20/ 2.21 require benefit for them to recognise NSIP app
48. SP: is it statement M10 14a)?
49. MS: yes
50. SP: NPPF already supports this cannot repeat national policy, why do you need a specific reference in the Plan? Is there something specific about Stafford to make it relevant?
51. MS: it is national issue so significant in that sense para 12.14 recognise i.e. para 162 NPPF consider area purpose create framework more favourable at point of PINs assessment. I think support for this type of project should be clearer in the plan
52. SP: how much does your proposal add to this Plan?
53. MS: it wouldn't be repeating national policy. Propose I2?

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54. DS MS final para 162 not necessary to repeat and separate policy isn't necessary our support goes without saying. Plan will lose coherence if we add something
55. SP: it could positively promote if it was the objective of the Plan.
56. DS: it would require a good reason to give open ended support
57. SP: If SBC decide the Merthy site was the best you could have a positive policy?
58. DS: If there were evidence
59. SP: (to MS) why do you require repetition of NPPF? You want it to specifically refer to Merthyr?
60. MS: fits with policy E5, when referring to employment – energy generation think Pins would use it in their assessment. Para 12.14 re energy statement table about increasing energy self sufficiency, what does self-sufficiency mean?
61. SP: I'll come to a view re energy policy.

Master Plans (MPs)

62. There are two main views – parish councils and developers starting a useful debate. MPs are BSC initiative to be submitted 'before the decision'. But where in the timeframe will they be submitted? PP at the E is already granted?
63. DS: our general position is at para 2.9 – 2.11 it would serve illustrative purposes not bureaucratic so formal agreement is not required but it would form the bases of the planning application to be determined i.e. in Stone we'll require an order of detail. We're trying to avoid a piecemeal approach, bringing the northern district together i.e. considering the number of operators we would ideally receive the MP asap
64. SP: so this could be within the planning process?
65. DS: yes we'd like it to be inclusive of the community
66. SP: re changes to rules and regulations – apps have to undertake pre-consultation i.e. MP here?
67. DS: Yes
68. SP: W of Staff more developers involved and you want to know how the individual planning apps are going to fit together to make the jigsaw?

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69. DS; yes. It is difficult to discuss the boundaries of the N'ern site – MPs cover a higher understanding of the function of an area so we can appreciate the significance of boundaries being sought
70. SP: Re HW list – Re N Staff discussion – gave estimates of capacity asked Akzo Nobel to give best estimate of what they could provide, DSHW – consider position on 3,100

* * *

71. SP: (to RT) Where do you think the MP should be submitted?

72. RT: Para 6.10 integrate transport strategy, require minimum number of junctions and have no overall infrastructure strategy to control this, we want to avoid piecemeal development

Re MP M10/3a para 4 think policy is unclear re process how approach and what weight given? There is a single SDL two separate developers and additional landowners

Got to be a specific MP not overall MP including proposals for roads, how plans have changed and the geography of sites have changed.

M10/3a – endorsed SDL MP prior to planning application before coffee less precise parallel to planning application and community engagement re scale and nature. There is uncertainty re no of sites and reconfiguration 3 questions:

1. Further clarification re N'ern MP including both sites
2. Time scales, public are not party to these closed door discussions so we rely on set time scales and 21 days is insufficient notice
3. Clarify how the MP is approved and what weight it carries considering changes to the sites?

73. SP: I understand your concerns, seeking MP before application is submitted

74. RT: emphasise Maximo consultation – didn't include N'ern access road through it. The planning committee was unaware of these two applications going through the same day

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75. CC: we don't disagree with the principal of MP but it doesn't align with NPPF – SD aim to facilitate increase level of supply of houses and jobs. HPO Belway site identify as sustainable location for growth if not prejudice delivery of other SDL. It adds another hurdle for the SDLs and if SBC can't demonstrate a 5-year supply...
76. SP: words of the policy needs to be better crafted, the lawyers would have field day. Before or during the planning process? Where are the community involved? Does SCI cover?
77. The concerns are that CC thinks it is not needed and the parish councils want it to be formally approved.
78. HW to amend the working
79. 'any application for development must be preceded by..'
80. Re policy I1 has no reference to MP – where is it in the text?
81. CC: it is in Staff 3 policy
82. DS: 13.21 re policy framework not intended to be different from MP
83. SP: HW review 13.21 wording

[Talking about how they'll be time for public to see HW and then that the modifications will undergo formal consultation time frames for further comment]

84. SP: re monitoring and review, Appendix E indicators and targets
Remind me what proportions of allocations are coming from SDLs?
85. DS: we have update table 6.54 about 10% includes the level of agreements and commitments
86. SP: it is about flexibility not all for windfalls on top of current i.e. former industrial site 4/5 hectare suitable for residential development would contribute?
87. DS: not relying on SP7 to endorse within boundaries, we are seeking a proportional split across the policies
88. SP: re flexibility to meet overall figures i.e. SHLAA to meet Staff 7,200 including completions and commitments

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Re infrastructure schedules all Ms and FAMs consider requirements and suggestions e.g. SCC/EA/Natural England.
Are there any outstanding issues?

89. DS: No
90. RT: 2 points and 1 question – for other parishes too. FAM 19 deletes E distributor road as we can't afford 65mil Q= compare the cost to road maintenance, the problem is unsustainable, it is dangerous and has been for the last two decades. Also yesterday there was an article about a new primary school off A5013 W'ern road
91. SP: that could be to meet an existing deficiency and nothing to do with new development
SCC are going to respond to concerns re E distributor existing congestion within the area and on the M6 (diversion routes and HGV problems)
92. MD: Re M6 and RTs concerns – these are for the highways agency. The extension of the 'managed highway project' at junction 19. SDRN – have to bid for money or a developer to fund. The worst recorded delays are 10 minutes
93. SP: conclusions re HW please consider: deadlines/ future programme/ time for reviewing HW and further consultation period/ procedural matters and what to expect

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