

T Stevenson response

As with most of the local residents with whom I have discussed this plan, I find the presentation as an online document very difficult to use and the online response recommended equally complicated. Although it may not be your preference therefore, I will respond by email to my concerns which may or may not be specifically covered in the documents presented, different parts of which I find cannot readily be read together as required. The document does appear to contain conflicts that are not resolved however.

Agricultural Development

The majority of the land in the borough is in agricultural use, within which established residential communities or individual developments are present, sharing the same infrastructure. These communities in the past, frequently contained a number of houses for the workforce to farm the land, but the reduction in the workforce as a result of increased mechanisation on farms, has led to fewer rural residents being engaged in farm employment and farmers selling off the surplus farm buildings and housing for use as part of the general housing stock. The proceeds of such disposals are usually invested in more land, industrial facilities or improved accommodation for their families. In this process, the balance between the normal use of the infrastructure has become distorted, with ever larger farming equipment unsuited to the infrastructure available, threatening the safety, amenity and environment of those residing in rural areas, however they are employed. I do not see any recognition of this process or how it is to be addressed, reflected in the Plan, yet the adverse effects are there to see. Why is there no policy to deal with agricultural development and its effect on most communities in a predominantly rural area such as Stafford Borough?

As examples of the effects above; - consider the reduction in the number of dairy farms brought about by pressure to reduce the costs of milk production. This is resulting in the creation of a smaller number of increasingly large dairy farms with cattle herds of 1,000 cows or larger, some housed wholly indoors and all requiring large daily deliveries of foodstuff, etc., producing large volumes of slurry and manure for storage and disposal along inadequate roads. The farms require commensurately large land areas, but are often based on existing farms of smaller area, amalgamated with the land from other small farms, the whole farm becoming an industrial complex out of scale with the characteristics of the locality.

- alternatively, consider the evolution of soft fruit growing, where commercial pressure for cheaper supplies of fruit with a consistent quality, has led to farmers and investors covering vast areas with plastic fed by irrigation pipes and overlaid with poly tunnels. The wildlife, environment and amenities in these areas are immediately lost, drainage problems arise from the increased rate of run-off, transport difficulties are created over a wide area as unmanaged construction vehicles break down hedges to operate the site, the road and access points are consistently plastered with mud. The removal of the produce from site takes place using slow moving tractor based trailers, creating dangerous traffic conditions by operating for long distances on roads where no overtaking is permitted.

I do not see any reference to the control of such operations, the imposition of effective site management, road cleaning, provision of toilet and hand washing facilities, traffic control. Instead an uncontrolled facility is allowed to develop, exhibiting antisocial behaviour on a large scale with no regard for the impact this has on the local infrastructure, those residing nearby or the travelling public.

Renewable Energy

Sustainable power generation is a desirable objective, with a number of alternative means in use to benefit from the technology and resources available. In terms of efficiency however, there is general acceptance that on shore wind turbines are one of the least effective because of the unreliability of the wind source compared with the absolute guarantee required that reliable power will be available on demand 24hrs per day. This places great reliance on other sources of power generation to provide equivalent power output when wind turbine output cannot be relied on. On many inland sites that reduces their efficiency as a generator to about 20% making the case for investment in their contribution to renewable energy very difficult to demonstrate. When the adverse visual effects of wind turbines and their supply cables are taken into account, which have an adverse effect on other uses, it is difficult to see why this policy has been incorporated for most of the sites shown and whether any true independent evaluation of the sites identified has been carried out. Could it be that a commercial expression of interest, allied to an enthusiastic landlord, seeking to invest in a fashionable money spinning venture, have in fact been combined to create the locations identified in the Plan?

Transport

The transport policy seems to consist of a wish list of historic proposals not yet achieved, rather than a forward looking document assessing the transport problems the area suffers from, a forecast of how those problems will change in the years ahead and proposals to deal with those changes. At present Stafford is considered a serious bottleneck by travellers on any route that passes through it. In addition the roads in the surrounding rural areas appear to belong to the third world, their condition and maintenance a disgrace to the authorities responsible. In many areas the cause is clear; abuse by large agricultural vehicles, too wide to be accommodated on the lanes in use, with no policy or effort directed towards controlling their excesses, requiring restitution of the irresponsible damage they cause or dealing effectively with what is a very serious problem.

Where are the policies to restrict traffic speed on narrow single track lanes to a sensible level instead of the current suicidal 60mph?

Where are the policies to create intervisible passing bays on single track lanes used by mixed traffic?

Where are the policies to identify safe routes for pedestrians, cyclists and horses, warning other traffic they can expect to encounter them in the middle of the road?

What is the policy to enable Stafford to operate as a market town, attractive to visitors for shopping, rather than a traffic nightmare to be avoided as far as possible?



**The Plan for Stafford Borough
Pre-Submission Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to forwardplanning@staffordbc.gov.uk
- or by fax to: 01785 619473

Responses must be received by 12 noon on Thursday 28th February 2013

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Kathryn"/>
Last Name	<input type="text"/>	<input type="text" value="Ventham"/>
Job Title (if applicable)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (if applicable)	<input type="text" value="Taylor Wimpey UK Ltd"/>	<input type="text" value="Barton Willmore"/>
Address Line 1	<input type="text" value="C/o Barton Willmore"/>	<input type="text" value="Regent House"/>
Address Line 2	<input type="text"/>	<input type="text" value="Prince's Gate"/>
Address Line 3	<input type="text"/>	<input type="text" value="4-6 Homer Road"/>
Address Line 4	<input type="text"/>	<input type="text" value="Solihull"/>
Postcode	<input type="text"/>	<input type="text" value="B91 3QQ"/>
Telephone	<input type="text"/>	<input type="text" value="0121 711 5151"/>

Number

E-mail address Kathryn.ventham@bartonwillmore.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation	Taylor Wimpey UK Ltd
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3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Spatial Principle 2 (SP2)
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If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

4. Do you consider that the Plan for Stafford Borough is:

a. **Legally compliant*?**
Yes No

b. **Sound*?**
Yes No

To check a box when completing this form electronically, double click on it and select 'checked' under default value.

**Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

5. Do you consider The Plan for Stafford Borough is unsound because it is not:

- a. **Positively Prepared**
- b. **Justified**
- c. **Effective**
- d. **Consistent with national policy**

6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the

legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

See separate technical note.

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

See separate technical note.

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- 8. If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?**

a. **Yes** I wish to participate at the Examination in Public

b. **No** I do not wish to participate at the Examination in Public

- 9. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary**

The amount and distribution of housing is a strategic matter that will be a key consideration when assessing the soundness of the Plan for adoption.

Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public

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Part B – Please use a separate sheet for each representation

Name or Organisation	Taylor Wimpey UK Ltd
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3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Spatial Principle 3 (SP3)
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Yes No
- b. **Sound*?**
Yes No

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Policy SP3 sets out the settlement hierarchy for Stafford with Stafford and Stone the two main areas and then the 'Key Service Villages' of Eccleshall, Gnosall, Hixon, Great Haywood, Little

Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield.

It is commented in paragraph 6.27 that when considering factors such as *'level of services and facilities, environmental designations, transport links and access to employment... it may be appropriate for different Key Service Villages to have different levels of development based on these factors and their individual characteristics'*.

However, it is not clear where the distribution of housing numbers between the key service villages takes place with policy SP4 setting a target of 12% across all Key Serviced Villages.

It is agreed that there should be different levels of growth across the Key Serviced Villages and it is considered that Great Haywood (and neighbouring Little Haywood/Colwich) are collectively one of the most sustainable Key Serviced Villages. The Local Plan needs to reflect this high level of sustainability. The Local Plan acknowledges that the villages collectively *contain 'a range of community facilities including schools, a health centre and local retailing'* and a level of local employment (paragraph 6.31).

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The sustainability credentials of the villages within the 'Key Serviced Villages' category should be made clearer so as to direct growth in the most sustainable manner possible in meeting the needs of Stafford Borough.

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The amount and distribution of housing is a strategic matter that will be a key consideration when assessing the soundness of the Plan for adoption.

Please ensure you have printed your name or organisation at the top of this form

Part B – Please use a separate sheet for each representation

Name or Organisation	Taylor Wimpey UK Ltd
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3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Spatial Principle 4 (SP4)
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If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

10. Do you consider that the Plan for Stafford Borough is:

c. **Legally compliant*?**
Yes No

d. **Sound*?**
Yes No

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If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.

11. Do you consider The Plan for Stafford Borough is unsound because it is not:

- e. **Positively Prepared**
- f. **Justified**
- g. **Effective**
- h. **Consistent with national policy**

12. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

Policy SP4 sets out a distribution of housing growth between Stafford, Stone, Key Service Villages and the Rest of the Rural area. The proposed distribution of growth suggests 72% for Stafford,

8% for Stone, 12% for Key Service Villages and 8% in the rural area. Actual distribution and delivery since 2001 has been more greatly accommodated within the Key Serviced Villages and Rural Area with Stafford and Stone providing 48% and 17% respectively.

Whilst the role of Stafford and Stone as the most sustainable locations for strategic growth is acknowledged and supported, it is considered that the distribution for Key Serviced Villages should be increased so as to ensure that the settlements can continue to grow at a sustainable level and retain local services and facilities viably.

The provision for key serviced villages is 1,200 dwellings over the 20 year plan period and with 99 completions and 472 commitments already in place the new provision to be found is just 621 dwellings up to 2031. Given that there are 11 key serviced villages this equates to approximately 57 dwellings per village to be found up to 2031 if the distribution is evenly spread.

It is considered that this level of growth may not be sufficient to ensure that the Key Serviced Villages retain the key facilities that they currently have. Whilst the overall strategy to direct growth towards Stafford and Stone is appropriate, the Council must not neglect both the existing and future residents outside of these areas. By limiting growth to a level which is well below the amount that has occurred during the last plan period there is a real danger that facilities will be lost. The impact of such a loss will be felt most keenly by the more vulnerable members of society.

The level of growth in rural areas should also be considered carefully as, where there are limited existing facilities the amount of additional development proposed is unlikely to secure new facilities. Directing growth towards these areas is wholly unsustainable and whilst infilling development may be appropriate an amount of 800 dwellings (just 400 less than the Key Serviced Villages) is not considered to be justified.

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The distribution of housing should be adjusted to allow for greater levels of development within Key Serviced Villages so that the retention of existing and provision of new facilities can be achieved so as to secure greater levels of sustainability. It is suggested that the amount directed to rural areas is reduced in order to allow for greater development in Key Serviced Villages.

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14.If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?

c. **Yes** I wish to participate at the Examination in Public

d. **No** I do not wish to participate at the Examination in Public

15.If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

The amount and distribution of housing is a strategic matter that will be a key consideration when assessing the soundness of the Plan for adoption.

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Name or Organisation	Taylor Wimpey UK Ltd
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3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	Spatial Principle 6 (SP6)
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- a. **Legally compliant*?**
 Yes No
- b. **Sound*?**
 Yes No

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The principle of 'achieving rural sustainability' as set out in Policy SP6 is supported, however, the feasibility of sustaining the social and economic fabric of all rural communities should be

considered. The provision of increased development in Key Serviced Villages is considered to be the most sustainable method of meeting the needs of the wider rural area. The creation of local hubs will ensure that there is a good level of sustainability Borough-wide.

It is not viable to retain a significant level of facilities in all rural locations and as such focusing development in areas such as Great Haywood is the most effective method for ensuring the sustainability of nearby local villages such as Ingestre.

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

It should be acknowledged within policy SP6 that the most achievable method for meeting the needs of the wider rural areas is to focus development in the Key Serviced Villages so as there is a good range of facilities available to all.

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e.g. Policy Reference, Paragraph, Map title	Spatial Principle 7 (SP7)
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Yes No

d. **Sound*?**
Yes No

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- g. Effective
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It is stated in Policy SP7 that 'Settlement Boundaries will be established for the Sustainable Settlement Hierarchy defined in Spatial Principle SP3.' However, the online mapping portal currently shows only settlement boundaries for Stafford and Stone and not the Key Serviced Villages. It is understood that the adoption of the Local Plan will remove the existing settlement

boundaries from the 2001 Local Plan and the replacement boundaries will be drawn through neighbourhood plans or other subsequent DPDs.

It is considered that the settlement boundaries for Key Serviced Villages are a strategic matter and should be considered through the Local Plan. The approach that the Council is taking in delaying the publication of these boundaries will lead to a great deal of uncertainty for planning in these areas over a prolonged period of time and as such is not a sound strategy for growth.

In considering Great Haywood, it is preferable that the green gap between Great Haywood and Little Haywood is retained so as to protect the local identity of the two areas and also so as to respect the area of historic ridge and furrow identified in this location on the Proposals Map.

Given this, and the tight constraints from the railway line to the west and A51 to the east, it is considered that locating growth on the northern edge of Great Haywood is the most appropriate location for meeting future housing needs in this area.

13. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Settlement Boundaries should be set for all Key Serviced Villages and our comments in relation to Great Hawyood should be considered in drawing these boundaries.

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Part B – Please use a separate sheet for each representation

Name or Organisation	Taylor Wimpey UK Ltd
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3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	C2
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4. Do you consider that the Plan for Stafford Borough is:

- a. **Legally compliant*?**
Yes No
- b. **Sound*?**
Yes No

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The Policy sets out the affordable housing requirements for the Borough with 30% expected across the Borough, apart from in Stone, Eccleshall, Gnosall, Woodseaves, Barlaston, Tittensor

and Yarnfield where a target of 40% is set. It should be noted that the evidence base for this was carried out in July 2011 and the plan period is to cover a period up to 2031. In setting high targets which are a significant challenge for developers the Council risks stagnating growth.

Whilst the policy allows for submissions on viability to offset such requirements, we are concerned that the local authorities expect the developer to demonstrate whether the policy is unviable. The burden of proof should not reside with the developer or land owner to demonstrate in each case that his development is unviable before he can secure a relaxation of policy. This would impose unreasonable financial burdens on development to the detriment of housing delivery and economic growth. The starting point for the Council must be to ensure that its policies are sound.

The NPPF states at paragraph 173 that "sustainable development requires careful attention to viability and costs in plan making". The cumulative impact of all policy requirements needs to be fully understood.

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The affordable housing target should be reconsidered and reduced so that it will be viable on most sites and the over-reliance on developers producing viability assessments on a case-by-case basis should be avoided.

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The representations made on behalf of Taylor Wimpey address a wide range of complex and interrelated issues. Participation at the oral examination is necessary to ensure their position and views are properly explained and made.

Part B – Please use a separate sheet for each representation

Name or Organisation	Taylor Wimpey UK Ltd
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e.g. Policy Reference, Paragraph, Map title	N2
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The Policy sets out a range of sustainable design features which new development is expected to incorporate. Whilst the policy allows for submissions on viability to off set such requirements,
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there is no part of the Plans evidence base which explains how the level of environmental standards proposed in the policy are viable for most developments.

We are concerned that the local authorities expect the developer to demonstrate whether the policy is unviable. The burden of proof should not reside with the developer or land owner to demonstrate in each case that his development is unviable before he can secure a relaxation of policy. This would impose unreasonable financial burdens on development to the detriment of housing delivery and economic growth. The starting point for the Council must be to ensure that its policies are sound.

The NPPF states at paragraph 173 that “sustainable development requires careful attention to viability and costs in plan making”. The cumulative impact of all policy requirements needs to be fully understood.

13. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Further evidence is required to demonstrate that the environmental building standards proposed are viable for most developments.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.*

After this stage, further submissions will only be at the request of the Planning Inspector, based on the matter and issues he / she identifies for examination

14. If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?

c. **Yes** I wish to participate at the Examination in Public

d. **No** I do not wish to participate at the Examination in Public

15. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

The representations made on behalf of Taylor Wimpey address a wide range of complex and interrelated issues. Participation at the oral examination is necessary to ensure their position and views are properly explained and made.

20474/A3/ELS/cjh

28th February 2013

Dear Sirs

Planning Representations on behalf of Trent Vision Trust
The Plan for Stafford Borough – Publication (Pre-Submission)

We act with regard to the on-going development of the Stafford Plan on behalf of Trent Vision Trust (TVT) and have been instructed to submit the following planning representations to the Plan for Stafford Borough (the Plan).

These representations build upon and supplement those submitted on behalf of TVT by Turley Associates (April 2009), a further submission by Barton Willmore (September 2011) on the Stafford Borough Draft Publication and most recently a submission by Oliver Dyke Associates in July 2012 on the Plan for Stafford Borough – Strategic Policy Choices (Appendix 1).

Detailed Comments

Key Objectives as stated in previous representations, **Key Objective 17** is supported, in that mixed use town centre proposals will be delivered to enhance the centre of Stone, providing retail, leisure and canal based community activities. However, the Plan fails to specify where these proposals should be delivered. To be effective this objective should be expanded (NPPF Paragraph 182), providing more details of specific locations and uses.

Key Objective 19 is also supported, enhancing and safeguarding the landscape setting of the Trent Valley corridor through the town in terms of biodiversity, accessibility, recreation and community uses. However, this should not restrict development within the Trent Valley corridor if the benefits outweigh the impact of developing within the Trent Valley corridor. This will ensure the Plan is flexible and in accordance with National Policy.

The Sustainable Settlement Hierarchy (Page 26) the position of Stone is supported within the hierarchy and it is agreed that there is capacity for growth within the settlement. **Paragraph 6.24** highlights that growth within Stone should be constrained and phased until 2021 in order to provide time and opportunity to deliver high quality developments on brownfield regeneration sites in North Staffordshire conurbation first. This is not agreed. If the development is appropriate and in a sustainable location it should not be delayed to allow for development in North Staffordshire.



Therefore the Plan is not considered to be 'sound' in accordance with the National Planning Policy Framework (NPPF) (Paragraph 182) as it fails to be consistent with National Policy with the presumption of sustainable development, wherein local authorities should plan positively and seek opportunities to meet the development needs of their area (Paragraph 14).

The Distribution of Growth (Page 28) following representations previously submitted to the 'Strategic Policy Choices' it was highlighted that the housing allocation for Stone was underestimated, the points previously made should be reiterated, concerning **Spatial Principle 4 (SP4)**. Given Stone's historic housing growth figures set out within the Local Plan 2001 (17%) and hierarchical position, the town should be capable of accommodating more growth than the 8% set out.

It is identified that the housing figure for Stone should be increased to be more in line with historic figures.

It is reiterated that the Plan is not considered to be 'sound' in accordance with the NPPF as it fails to provide sufficient justification for the housing numbers set out within the Plan for Stone.

It is agreed that new development will need to be provided, generally, outside the existing built up area because there are insufficient infill sites to deliver the scale of new development required (**Paragraph 6.40**).

Spatial Principle 7 (SP7) highlights that development proposals should maximise the use of brownfield sites to reduce the need for greenfield sites. It also states that only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released. This is not agreed. If greenfield sites are available within a more suitable location than a brownfield site then the preference should be development of the greenfield site.

This is contrary to the soundness test within NPPF which states that plans should be 'positively prepared' and based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. Again the Plan fails to be consistent with National Policy with the presumption of sustainable development, wherein local authorities should positively seek opportunities to meet the development needs of their area (Paragraph 14).

It is highlighted that allocations for specific sites will be considered either within the forthcoming Site Allocations document or Neighbourhood Planning process to confirm where sites are to be located, as highlighted within **Paragraph 6.66**. However, these sites should be considered now and included within the Plan for Stafford Borough because it is unclear how the housing is intended to be allocated. This was highlighted in representations previously submitted on behalf of TVT but have not been taken into consideration within this version of the Plan for Stafford.

Stone Town Centre (Page 62) it is supported that Stone Town Centre should be strengthened with the provision of additional retail, including 1,400 sqm convenience (food) retailing (**Policy Stone 1**).

The aforementioned Policy also highlights that Westbridge Park should include the provision of a mixed use development. To be effective and precise, 'mixed use development' should be expanded to confirm what uses are intended for this location and the extent of the capacity to be provided. Without this, the allocation is ineffective and unjustified should be removed (NPPF Paragraph 182).

In addition, further sites for mixed use development within Stone should be considered within the Sites Allocation document to ensure the most sustainable development is delivered in terms of location and accessibility to the town centre. The mixed use development should be located strategically to maximise the opportunity for linkages with the town centre but also create an

opportunity to trigger regeneration of land around the Trent and Mersey Canal, of which many parts are semi derelict and very underutilised.

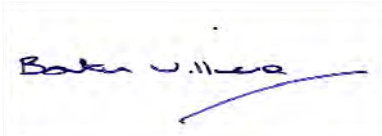
Furthermore it is important that the allocations of sites improve accessibility across the valley and provide improved public access to both the town's river and canal, attracting more visitors to Stone, thus ensuring vitality of the town centre, in accordance with NPPF (Paragraph 23).

Paragraph 8.14 highlights that new development should be focussed in Stone town centre, with sites considered through a sequential approach (edge of centre, then out of centre), this is agreed.

Town and Local Centres Policy E8 (Page 82) states that new development for retail warehouses and superstores are not required in an edge or an out of centre location. This is not supported. More flexibility should be given for edge and out of centre locations if the sequential approach can be satisfied, to ensure consistency with National Policy (NPPF - Paragraphs 24-26).

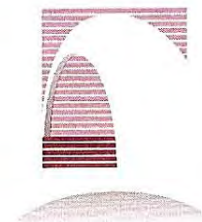
We would be grateful if you could confirm receipt of these representations. Should you wish to discuss the content please do not hesitate to contact Emma-Lisa Shiells or Paul Newton at this office.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Barton Willmore', with a long horizontal flourish extending to the right.

BARTON WILLMORE

Appendix 1



OliverDyke
Associates Ltd

Mr A Yendole
Forward Planning Section
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

10th July 2012

Dear Sir

Planning Representations on behalf of Trent Vision Trust
The Plan for Stafford Borough – Strategic Policy Choices

We act, with regard to the on-going development of the new Stafford Plan on behalf of Trent Vision Trust (TVT) and have been instructed to submit the following planning representations to the Plan for Stafford Borough.

These representation build upon and supplement those submitted on behalf of TVT by Turley Associates (April 2009) and more recently by Barton Willmore (September 2011) on the Stafford Borough Draft Publication (copies attached).

Detailed Comments

The Key Strategic Housing Allocation Diagram (page 7). This is not agreed. This diagrammatic plan which identifies strategic housing and employment allocations has not been agreed and is still the subject of further consultation. The plan should acknowledge this.

The Sustainable Settlement Hierarchy (page 16). TVT support the proposed sustainable settlement hierarchy that places Stone as the second largest settlement to Stafford. It is welcomed that the Plan acknowledges at paragraph 4.5 that the town has potential for growth.

The definition of town's potential growth should be expanded either within the Plan or within a Neighbourhood Plan for Stone. This would provide the local community the opportunity to explore the provision for greater infrastructure medical retail and leisure / recreation to support the town. Part of this proposed neighbourhood plan should consider in particular the viability of the regeneration within the Trent & Mersey Canal Conservation Area. The key objective being to attract increased investment tourism and visitors to this attractive canal / river setting at the very heart of the town.

The Distribution of Housing Growth (page 21) Given Stone's position within the hierarchy Stone should be capable of accommodating more growth than the 8% envisaged. It is clearly unsustainable to identify similar levels of growth in the Key Service Villages (12%) and Rest of Rural Area (8%) when they are acknowledged as less sustainable locations.

It is proposed that the Plan should identify a larger % of housing growth for Stone in line with historic growth rates i.e. 17% (identified in Para's 5.2 and 5.3).

Means of Directing Development (page 28) – The document seeks to defer the identification of Residential Development Boundaries to Neighbourhood Plans or through a Site-specific Allocations and Policies document if Neighbourhood Plans are not forthcoming. These should be identified now as it is a key part of the Council's strategy for delivering housing growth in the Borough. It is unclear how the Council understand the need to identify Strategic Housing Allocations when the extent of settlement boundaries and how much of the housing need can be met in existing settlements has not been established. In order to provide developers with certainty Settlement Boundaries should be clarified now and included within the Plan.

We would be grateful if you could confirm receipt of these representations. Should you wish to discuss the content further please do not hesitate to contact the undersigned.

Yours sincerely

A handwritten signature in black ink, appearing to read 'O.G. Dyke', written in a cursive style.

Mr O.G. Dyke BSc MRICS
DIRECTOR

Part A

I. Personal Details*

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

2. Agent's Details (if applicable)

Title	MR.	MR.
First Name	JOHN	STEPHEN
Last Name	MARTIN.	LOCKE
Job Title (if applicable)		PARTNER
Organisation (if applicable)	J.C. & K.T. MARTIN AND SONS	BERRYS.
Address Line 1		WILLOW HOUSE EAST
Address Line 2		STREWSBURY BUSINESS PARK
Address Line 3		STREWSBURY
Address Line 4		SHROPSHIRE.
Postcode		SY2 6LG.
Telephone Number		01743 267062
E-mail address		stephen.locke@henrybros.com

Part B – Please use a separate sheet for each representation

Name or Organisation	J.C. & K.J. MARTIN + SONS.
----------------------	----------------------------

3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	SP3 SUSTAINABLE SETTLEMENT HIERARCHY
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If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

4. Do you consider that the Plan for Stafford Borough is:

- a. **Legally compliant*?**
 Yes No
- b. **Sound*?**
 Yes No

To check a box when completing this form electronically, double click on it and select 'checked' under default value.
 *Please refer to the attached note for guidance on legal requirements and soundness.

If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.

5. Do you consider The Plan for Stafford Borough is unsound because it is not:

- a. **Positively Prepared**
- b. **Justified**
- c. **Effective**
- d. **Consistent with national policy**

6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

<p>ONLY A MINOR POINT BUT WE AGREE WITH THE PRINCIPLE OF KEY SERVICE VILLAGES BUT THE VILLAGE OF HIXON NEEDS MORE EMPHASIS ON HOUSING AND ITS EXCELLENT LINKS TO BOTH STONE AND STAFFORD.</p> <p>(attach separate sheets as necessary)</p>
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7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(attach separate sheets as necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.

After this stage, further submissions will only be at the request of the Planning Inspector, based on the matter and issues he / she identifies for examination

8. If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?

- a. Yes I wish to participate at the Examination in Public
- b. No I do not wish to participate at the Examination in Public

9. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

(attach separate sheets as necessary)

Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public

Please ensure you have printed your name or organisation at the top of this form

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	MR.	MR.
First Name	JOHN	STEPHEN
Last Name	MARTIN.	LOCKE
Job Title (if applicable)		PARTNER
Organisation (if applicable)	J.C. & K.T. MARTIN AND SONS	BERRYS.
Address Line 1		WILLOW HOUSE EAST
Address Line 2		STREWSBURY BUSINESS PARK
Address Line 3		STREWSBURY
Address Line 4		STROPSHIRE.
Postcode		SK2 6LG.
Telephone Number		01743 267062
E-mail address		stephen.locke@henrybros.com

Part B – Please use a separate sheet for each representation

Name or Organisation	J.C. & K.J. MARTON + SONS.
----------------------	----------------------------

3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	SP4 HOUSING GROWTH DISTRIBUTION
---	---------------------------------

If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

4. Do you consider that the Plan for Stafford Borough is:

a. **Legally compliant*?**
 Yes No

b. **Sound*?**
 Yes No

To check a box when completing this form electronically, double click on it and select 'checked' under default value.

*Please refer to the attached note for guidance on legal requirements and soundness.

If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.

5. Do you consider The Plan for Stafford Borough is unsound because it is not:

- a. Positively Prepared
- b. Justified
- c. Effective
- d. Consistent with national policy

6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

WE CONSIDER THAT A HIGHER PERCENTAGE OF HOUSING GROWTH SHOULD GO TO THE KEY SERVICE VILLAGES - CURRENTLY AT 12% OF THE TARGET WE FEEL THAT THIS SHOULD BE INCREASED TO AT LEAST 15% WITH THE STAFFORD TARGET REDUCED TO 6% (attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

REDUCE HOUSING GROWTH TARGET
 FOR STAFFORD TO 6% AND
 INCREASE KEY SERVICE VILLAGE
 TARGET TO 15%.

(attach separate sheets as necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.

After this stage, further submissions will only be at the request of the Planning Inspector, based on the matter and issues he / she identifies for examination

8. If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?

- a. Yes I wish to participate at the Examination in Public
- b. No I do not wish to participate at the Examination in Public

9. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

TO ENABLE A DISCUSSION ON WHY
 72% OF HOUSING IS BEING FOCUSED
 ON STAFFORD.

(attach separate sheets as necessary)

Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public

Please ensure you have printed your name or organisation at the top of this form



**The Plan for Stafford Borough
Pre-Submission Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to forwardplanning@staffordbc.gov.uk
- or by fax to: 01785 619473

Responses must be received by 12 noon on Thursday 28th February 2013

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

Part A

I. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text"/>	Mrs
First Name	<input type="text"/>	Janet
Last Name	<input type="text"/>	Hodson
Job Title (if applicable)	<input type="text"/>	Principal
Organisation (if applicable)	<input type="text"/>	JVH Town Planning Consultants
Address Line 1	<input type="text"/>	Houndhill Courtyard
Address Line 2	<input type="text"/>	Houndhill
Address Line 3	<input type="text"/>	Marchington
Address Line 4	<input type="text"/>	Staffordshire
Postcode	<input type="text"/>	ST14 8LN
Telephone Number	<input type="text"/>	01283 820040
E-mail address	<input type="text"/>	office@jvhplanning.co.uk

Part B – Please use a separate sheet for each representation

Name or	JVH Town Planning Consultants Ltd
---------	-----------------------------------

Organisation	
--------------	--

3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	SPATIAL PRINCIPLE 2 (SP2) SPATIAL PRINCIPLE 4 (SP4) SPATIAL PRINCIPLE 6 (SP6) – ACHIEVING RURAL SUSTAINABILITY SPATIAL PRINCIPLE 7 (SP7) Key Diagram Stone Town Key Diagram POLICY STONE 2 – WEST & SOUTH OF STONE Stone Concept diagram Policy C2 Affordable Housing Policy C5 Residential Proposals outside the Settlement Hierarchy

If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

4. Do you consider that the Plan for Stafford Borough is:

- a. **Legally compliant*?**
 Yes No
- b. **Sound*?**
 Yes No

*To check a box when completing this form electronically, double click on it and select 'checked' under default value. *Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

5. Do you consider The Plan for Stafford Borough is unsound because it is not:

- a. **Positively Prepared**
- b. **Justified**
- c. **Effective**
- d. **Consistent with national policy**

6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

<p>SPATIAL PRINCIPLE 2 (SP2) SPATIAL PRINCIPLE 4 (SP4)</p> <p>We object to Policy SP2 and SP4 on the basis that the Housing Strategy relies too heavily upon sites in Stafford to deliver the strategy and does not take enough account of the potential of the key service villages such as Hixon. We also object to the target of 500 homes per annum on the</p>

basis that this is too low a figure to provide for the needs of the Borough's future predicted housing growth. The plan has already failed to deliver the 500 homes required per annum within the first year of the plan, with only 424 homes being completed. On this basis, (which was a significant increase on the previous two years completions rates, where only 193 and 220 homes were constructed respectively) the plan is already failing to deliver based upon the existing commitments. Concern is raised as to the success of future delivery rates based on recent performance, which is patchy at best over the last 3 years. In order to address this a higher overall housing figure of a minimum of 11,500 homes over the plan period should be adopted to reflect the latest household projections (which are referenced within the plan.)

It is apparent that in order to deliver the plan the strategic housing growth locations must be in places that are attractive to the market and given the fragile state of the economy it is apparent that smaller sites are more deliverable than a reliance upon larger allocations. We object to the large allocations proposed around Stafford, which we object to on grounds of deliverability. The initial costs and time for infrastructure delivery associated with such sites will not bring homes forward early within the plan period. Sites such as those within the key service villages are attractive to the market and are therefore far more deliverable and at a rate that they can help achieve the housing requirement. Based on the first years performance alone the plan will fall 1520 homes short of the target for the borough by the end of the plan period. It is however apparent that the key service villages can and are delivering with completions at 99 homes in the last year in comparison to only 120 completions in Stafford itself.

We therefore consider the proposed growth strategy within the plan is fundamentally flawed in terms of both the overall housing target and the likely deliverability of such large development sites on the edge of Stafford. These are not considered able to bring the required level of homes forward to ensure the housing target is met in an effective manner and will result on too many large sites being expected to deliver later on within the plan period. This will also require a large amount of sales in close proximity, which is not considered to be achievable within the current and foreseeable economic climate.

SPATIAL PRINCIPLE 6 (SP6) – ACHIEVING RURAL SUSTAINABILITY

It is considered that additional growth within the key service villages can help achieve support for a sustainable rural economy. Growth in the key service villages can help assist a sustainable critical mass and will therefore increase sustainability, as such housing growth can help support local schools and businesses to ensure that service villages have the ability to support and expand the services for which they have been so named within the plan (i.e. key service villages).

SPATIAL PRINCIPLE 7 (SP7)

This policy requires to be reworded as it is unworkable in its current format it is unclear where and when settlement boundaries will be established it needs to make it clear that when boundaries are altered provision for new development will be included within the amended boundaries. It is not clear in the current wording of the policy how and when this will take place. In order to amend these boundaries it is clear that sites will have to have been considered and effectively allocated in order to amend these boundaries to include for new development. This policy therefore appears unworkable without this information. It would appear that it will also lead to a retrofitting of sites to boundaries.

Key Diagram

We object to the key diagram on the basis that it should reflect the amend growth split as we have set out in our objection to SP4 and its suggested alterations below.

Stone Town Key Diagram

POLICY STONE 2 – WEST & SOUTH OF STONE

Stone Concept diagram

We object to these policies and plans which should be amended to reflect other more sustainable and deliverable sites namely the inclusion of land between the Trent and Mersey canal and the north of A34.

Policy C2 Affordable Housing

The amounts identified are too high in a fragile housing market, where housing deliverability in any format is proving difficult for large sections of the market. Trying to secure the percentages of affordable homes as identified is unrealistic and may jeopardise the overall delivery of the housing strategy. The figures identified should therefore be halved to a maximum of 15/20% respectively.

Policy C5 Residential Proposals outside the Settlement Hierarchy

This policy needs to be amended to be far less prescriptive, it is considered to be far too onerous and not in accordance with the NPPF (Section 7 on Good Design). It is not positively prepared and is therefore out of step with the NPPF. **Section C** should be removed as it does not promote development in a positive fashion and give the ability to take account of good design and is therefore also out of step with the NPPF.

Policy C5 Residential Proposals outside the Settlement Hierarchy B. Replacement

Dwellings should be expanded to include a catch all element, that states that “**J**. Replacement/new dwellings will be considered on the relative merits of the scheme and the circumstances and history of the site.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

SPATIAL PRINCIPLE 2 (SP2)

Changes are required to the Spatial Principal 2 (SP2) to increase the proposed housing target from 500 dwellings per year to a minimum of 575 homes in order to achieve a minimum of 11,000 new homes for the borough, in order to ensure that the required projected household requirement is achieved.

SPATIAL PRINCIPLE 4 (SP4)

The Spatial Principle 4 (Sp4) also requires to be amended to redistribute a higher percentage of the new overall housing target of 11,500 new homes to the key service villages where demand for new homes and sites are both available and have significant developer interest.

This should see the current proposed percentage housing split be altered from 12% to 20% for the key service villages bearing in mind that these villages are made up of 12 separate settlements. With a reduction in the total housing provision in and on the edge of Stafford to 64% or 7,040 to reflect the overall higher housing target. It is clear from the first years completions that the key service villages are desirable to the market and can deliver.

SPATIAL PRINCIPLE 6 (SP6) – ACHIEVING RURAL SUSTAINABILITY

This policy should include wording that makes it clear that growth in the key service villages can help them assist a critical mass and with therefore increase sustainability as such housing growth can help support local schools and businesses to ensure that service villages have the ability to support and expand the services for which they have been so named within the plan.

SPATIAL PRINCIPLE 7 (SP7)

This policy requires to be reworded as it is unworkable in its current format it is unclear where and when settlement boundaries will be established it needs to make it clear that when boundaries are altered provision for new development will be included within the amended boundaries. It is not clear in the current wording of the policy how and when this will take place

The following wording should be removed:

‘Development proposals should maximise the use of brownfield redevelopment sites within the Borough’s towns and villages to reduce the need for greenfield sites. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released.

The removal of this is required in order to promote development, it is clear that the most sustainable developable deliverable sites should be those that are developed first. These may be on Greenfield sites rather than always taking the brownfield first approach where many sites may be unviable in the current market.

Stone Town Key Diagram

POLICY STONE 2 – WEST & SOUTH OF STONE

Stone Concept diagram

We object to these policies and plans which should be amended to reflect other more sustainable and deliverable sites between the Trent and Mersey canal and the north of A34.

Policy C2 Affordable Housing

The amounts identified are too high in a fragile housing market, where housing deliverability in any format is proving difficult for large sections of the market. Trying to secure the percentages of affordable homes as identified is unrealistic and may jeopardise the overall delivery of the housing strategy. The figures identified should therefore be halved to 15/20% respectively.

Policy C5 Residential Proposals outside the Settlement Hierarchy

This policy needs to be amended to be less prescriptive, it is considered to be far too onerous and not in accordance with the NPPF (Section 7 on Good Design). **Section C** should be removed as it does not promote development in a positive fashion and give the ability to take account of good design and is therefore out of step with the NPPF.

Policy C5 Residential Proposals outside the Settlement Hierarchy B. Replacement

Dwellings should be expanded to include a catch all element, that states that “J. Replacement/ new dwellings will be considered on the relative merits of the scheme and the circumstances and history of the site.

(attach separate sheets as necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.

After this stage, further submissions will only be at the request of the Planning Inspector, based on the matter and issues he / she identifies for examination

8. If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?

- a. **Yes** I wish to participate at the Examination in Public
- b. **No** I do not wish to participate at the Examination in Public

9. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

We act for a house building developer who can help deliver the future housing requirement for Stafford Borough and they are directly effected by the polices in the plan for Stafford Borough. Participation at the examination will enable us to fully explain our alternative suggestions to the strategy accompanied by evidence to support our position, which will assist the Inspector in arriving at a fully informed view and we will support our policy objections by making full and detailed responses to the questions that the Inspector will raise. We have a long and established planning knowledge of the Stafford Borough area and the previous development plan proposals.
(attach separate sheets as necessary)

Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public

Please ensure you have printed your name or organisation at the top of this form

Representation Form Guidance Notes



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough: Submission as part of an examination by an independent planning inspector. The purpose of the examination is to establish whether the plan has been prepared in accordance with **legal requirements**, and whether it is **sound**.

Representations should therefore focus on legal compliance and soundness.

If you wish to make a comment seeking to change The Plan for Stafford Borough you should make clear in what way you consider it is not legally compliant or sound. You should try to support your comment by providing evidence and supporting information showing why it should be changed. It will be helpful if you also say precisely how you think it should be changed.

For the plan to be **legally compliant** it must:

- be prepared in accordance with:
 - the Council's Local Development Scheme (a timetable for plan preparation);
 - the Council's Statement of Community Involvement (which includes the Council's policy for community engagement on The Plan for Stafford Borough) and
 - relevant Acts and Regulations; in particular the Town and County Planning (Local Planning) (England) Regulations 2012;
- have been subject to sustainability appraisal;
- have regard to:
 - national policies, advice and guidance issued by the Secretary of State; and
 - the Stafford Borough Sustainable Community Strategy and Stafford Borough Community Action Plan;
- be in general conformity with the Regional Spatial Strategy for the West Midlands;
- meet legal requirements under the Duty to Co-operate (introduced via the Localism Act 2011).

Soundness is explained in the National Planning Policy Framework. For a plan to be sound it must be:

- **Positively prepared** - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- **Justified** – the plan should be the most appropriate strategy based on a robust and credible evidence base;
- **Effective** – the plan should be deliverable over its period;
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Where there are groups who share a common view on how they wish to see The Plan for Stafford Borough changed, it would be very helpful for that group to send a single comment rather than for a large number of individuals to send in separate comments which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.



**The Plan for Stafford Borough
Pre-Submission Consultation**

Ref:

Representations Form

**(For official
use only)**

Please return completed forms to:

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to forwardplanning@staffordbc.gov.uk
- or by fax to: 01785 619473

Responses must be received by 12 noon on Thursday 28th February 2013

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

Part A

I. Personal Details*

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

2. Agent's Details (if applicable)

Title	<input type="text"/>	<input type="text" value="Mrs"/>
First Name	<input type="text"/>	<input type="text" value="Janet"/>
Last Name	<input type="text"/>	<input type="text" value="Hodson"/>
Job Title (if applicable)	<input type="text"/>	<input type="text" value="Principal"/>
Organisation (if applicable)	<input type="text" value="M J Barrett Group"/>	<input type="text" value="JVH Town Planning Consultants"/>
Address Line 1	<input type="text" value="Brookside Business Park"/>	<input type="text" value="Houndhill Courtyard"/>
Address Line 2	<input type="text" value="Brookside Road"/>	<input type="text" value="Houndhill"/>
Address Line 3	<input type="text" value="Uttoxeter"/>	<input type="text" value="Marchington"/>
Address Line 4	<input type="text" value="Staffordshire"/>	<input type="text" value="Staffordshire"/>
Postcode	<input type="text" value="ST14 8AT"/>	<input type="text" value="ST14 8LN"/>
Telephone Number	<input type="text" value="01889 546295"/>	<input type="text" value="01283 820040"/>
E-mail address	<input type="text"/>	<input type="text" value="office@jvhplanning.co.uk"/>

Part B – Please use a separate sheet for each representation

Name or Organisation	JVH Town Planning Consultants Ltd for M J Barrett Group
----------------------	--

3. What part of The Plan for Stafford Borough (including the Policies Maps document) does your comment relate to?

e.g. Policy Reference, Paragraph, Map title	SPATIAL PRINCIPLE 2 (SP2) SPATIAL PRINCIPLE 4 (SP4) SPATIAL PRINCIPLE 6 (SP6) – ACHIEVING RURAL SUSTAINABILITY SPATIAL PRINCIPLE 7 (SP7) Key Diagram Stone Town Key Diagram POLICY STONE 2 – WEST & SOUTH OF STONE Stone Concept diagram Policy C2 Affordable Housing Policy C5 Residential Proposals outside the Settlement Hierarchy

If your comment does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

4. Do you consider that the Plan for Stafford Borough is:

- a. **Legally compliant*?**
 Yes No
- b. **Sound*?**
 Yes No

To check a box when completing this form electronically, double click on it and select 'checked' under default value.

**Please refer to the attached note for guidance on legal requirements and soundness.*

*If you have entered **No** to Q4.b. please continue to Q5. In all other circumstances please go to Q6.*

5. Do you consider The Plan for Stafford Borough is unsound because it is not:

- a. **Positively Prepared**
- b. **Justified**
- c. **Effective**
- d. **Consistent with national policy**

6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

SPATIAL PRINCIPLE 2 (SP2) SPATIAL PRINCIPLE 4 (SP4)

We object to Policy SP2 and SP4 on the basis that the Housing Strategy relies too heavily upon sites in Stafford to deliver the strategy and does not take enough account of the potential of Stone and the key service villages. We also object to the target of 500 homes per annum on the basis that this is too low a figure to provide for the needs of the Borough's future predicted housing growth. The plan has already failed to deliver the 500 homes required per annum within the first year of the plan, with only 424 homes being completed. On this basis, (which was a significant increase on the previous two years completions rates, where only 193 and 220 homes were constructed respectively) the plan is already failing to deliver based upon the existing commitments. Concern is raised as to the success of future delivery rates based on recent performance, which is patchy at best over the last 3 years. In order to address this a higher overall housing figure of a minimum of 11,500 homes over the plan period should be adopted to reflect the latest household projections (which are referenced within the plan.)

It is apparent that in order to deliver the plan the strategic housing growth locations must be in places that are attractive to the market and given the fragile state of the economy it is apparent that smaller sites are more deliverable than a reliance upon larger allocations. We object to the large allocations proposed around Stafford, which we object to on grounds of deliverability. The initial costs and time for infrastructure delivery associated with such sites will not bring homes forward early within the plan period. Sites such as those within the key service villages are attractive to the market and are therefore far more deliverable and at a rate that they can help achieve the housing requirement. Based on the first years performance alone the plan will fall 1520 homes short of the target for the borough by the end of the plan period. It is however apparent that the key service villages can and are delivering with completions at 99 homes in the last year in comparison to only 120 completions in Stafford itself.

We therefore consider the proposed growth strategy within the plan is fundamentally flawed in terms of both the overall housing target and the likely deliverability of such large development sites on the edge of Stafford. These are not considered able to bring the required level of homes forward to ensure the housing target is met in an effective manner and will result on too many large sites being expected to deliver later on within the plan period. This will also require a large amount of sales in close proximity, which is not considered to be achievable within the current and foreseeable economic climate.

SPATIAL PRINCIPLE 6 (SP6) – ACHIEVING RURAL SUSTAINABILITY

It is considered that additional growth within the key service villages can help achieve support for a sustainable rural economy. Growth in the key service villages can help assist a sustainable critical mass and will therefore increase sustainability, as such housing growth can help support local schools and businesses to ensure that service villages have the ability to support and expand the services for which they have been so named within the plan (i.e. key service villages).

SPATIAL PRINCIPLE 7 (SP7)

This policy requires to be reworded as it is unworkable in its current format it is unclear where and when settlement boundaries will be established it needs to make it clear that when boundaries are altered provision for new development will be included within the amended boundaries. It is not clear in the current wording of the policy how and when this will take place. In order to amend these boundaries it is clear that sites will have to have been considered and effectively allocated in order amend these boundaries to include for new development. This policy therefore appears unworkable without this information. It would appear that it will also lead to a retrofitting of sites to boundaries.

Key Diagram

We object to the key diagram on the basis that it should reflect the amend growth split as we have set out in our objection to SP4 and its suggested alterations below.

Stone Town Key Diagram

POLICY STONE 2 – WEST & SOUTH OF STONE

Stone Concept diagram

We object to these policies and plans which should be amended to reflect other more sustainable and deliverable sites namely the inclusion of land between the Trent and Mersey canal and the north of A34.

Policy C2 Affordable Housing

The amounts identified are too high in a fragile housing market, where housing deliverability in any format is proving difficult for large sections of the market. Trying to secure the percentages of affordable homes as identified is unrealistic and may jeopardise the overall delivery of the housing strategy. The figures identified should therefore be halved to a maximum of 15/20% respectively.

Policy C5 Residential Proposals outside the Settlement Hierarchy

This policy needs to be amended to be far less prescriptive, it is considered to be far too onerous and not in accordance with the NPPF (Section 7 on Good Design). It is not positively prepared and is therefore out of step with the NPPF. **Section C** should be removed as it does not promote development in a positive fashion and give the ability to take account of good design and is therefore also out of step with the NPPF.

Policy C5 Residential Proposals outside the Settlement Hierarchy B. Replacement

Dwellings should be expanded to include a catch all element, that states that “J. Replacement/new dwellings will be considered on the relative merits of the scheme and the circumstances and history of the site.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

SPATIAL PRINCIPLE 2 (SP2)

Changes are required to the Spatial Principal 2 (SP2) to increase the proposed housing target from 500 dwellings per year to a minimum of 575 homes in order to achieve a minimum of 11,000 new homes for the borough, in order to ensure that the required projected household requirement is achieved.

SPATIAL PRINCIPLE 4 (SP4)

The Spatial Principle 4 (Sp4) also requires to be amended to redistribute a higher percentage of the new overall housing target of 11,500 new homes to the key service villages where demand for new homes and sites are both available and have significant developer interest.

This should see the current proposed percentage housing split be altered from 12% to 20% for the key service villages bearing in mind that these villages are made up of 12 separate settlements. With a reduction in the total housing provision in and on the edge of Stafford to 64% or 7,040 to reflect the overall higher housing target. It is clear from the first years completions that the key service villages are desirable to the market and can deliver.

SPATIAL PRINCIPLE 6 (SP6) – ACHIEVING RURAL SUSTAINABILITY

This policy should include wording that makes it clear that growth in the key service villages can help them assist a critical mass and with therefore increase sustainability as such housing growth can help support local schools and businesses to ensure that service villages have the ability to support and expand the services for which they have been so named within the plan.

SPATIAL PRINCIPLE 7 (SP7)

This policy requires to be reworded as it is unworkable in its current format it is unclear where and when settlement boundaries will be established it needs to make it clear that when boundaries are altered provision for new development will be included within the amended boundaries. It is not clear in the current wording of the policy how and when this will take place

The following wording should be removed:

'Development proposals should maximise the use of brownfield redevelopment sites within the Borough's towns and villages to reduce the need for greenfield sites. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released.'

The removal of this is required in order to promote development, it is clear that the most sustainable developable deliverable sites should be those that are developed first. These may be on Greenfield sites rather than always taking the brownfield first approach where many sites may be unviable in the current market.

Stone Town Key Diagram

POLICY STONE 2 – WEST & SOUTH OF STONE

Stone Concept diagram

We object to these policies and plans which should be amended to reflect other more sustainable and deliverable sites between the Trent and Mersey canal and the north of A34.

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Dwellings should be expanded to include a catch all element, that states that “J. Replacement/new dwellings will be considered on the relative merits of the scheme and the circumstances and history of the site.

(attach separate sheets as necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.

After this stage, further submissions will only be at the request of the Planning Inspector, based on the matter and issues he / she identifies for examination

8. If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?

- a. **Yes** I wish to participate at the Examination in Public
- b. **No** I do not wish to participate at the Examination in Public

9. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

We act for a house building developer who can help deliver the future housing requirement for Stafford Borough and they are directly effected by the polices in the plan for Stafford Borough. Participation at the examination will enable us to fully explain our alternative suggestions to the strategy accompanied by evidence to support our position, which will assist the Inspector in arriving at a fully informed view and we will support our policy objections by making full and detailed responses to the questions that the Inspector will raise. We have a long and established planning knowledge of the Stafford Borough area and the previous development plan proposals.
(attach separate sheets as necessary)

Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public

Please ensure you have printed your name or organisation at the top of this form

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Staffordshire Place No 1

Second Floor
Wedgwood Building
Tipping Street
Stafford
ST16 2DHTelephone Direct: 01785 277340
Email: jonathan.bloor@staffordshire.gov.uk**Please ask for:** Jonathan BloorForward Planning Section
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQBy Email Only: forwardplanning@staffordbc.gov.uk

Our ref: JB/SBCLP13

Your ref: N/A

Date: 28 February 2013

Dear Sir / Madam

**THE PLAN FOR STAFFORD BOROUGH DEVELOPMENT PLAN DOCUMENT -
PUBLICATION**

I write to provide representations on behalf of Staffordshire County Council's Strategic Property Unit (SPU) toward the above consultation document.

As a major landowner in Stafford Borough, SCC SPU takes a strong interest in the future development of the Borough. Consequently, SCC SPU has reviewed the Plan for Stafford Borough Development Plan Document - Publication (SBDPP) consultation document to ensure that it plans for the positive and viable development of the Borough to 2031. The focus of this review was to ensure that the emerging Local Plan is based on a sound, objectively-assessed evidence base and that the strategic priorities and policies it sets out are justified.

More specifically, this representation assesses whether or not the SBDPP:

- Has been positively prepared;
- Is justified;
- Is effective;
- Is consistent; and
- Is legally compliant.

In the main, this representation on the SBDPP focuses on housing and growth related matters, with particular emphasis on the overall supply and distribution of housing.

The content of this representation and the comments herein are submitted on behalf of the County Council's Strategy Property Unit in its function as a major landowner. This representation should therefore not be interpreted as a representation on behalf of the County Council as a whole.

As a key stakeholder in the Borough, we would be grateful if you can ensure that we are on the mailing list to receive further notifications of the Local Plan Examination in Public (EiP).

Strategic Property Unit Representations

The Sustainable Settlement Hierarchy (Policy SP3)

SCC SPU supports the general thrust of the Sustainable Settlement Hierarchy policy which sensibly directs the majority of development to the main conurbations of Stafford and Stone - whilst also allowing for the essential, sensitive development of Key Service Villages and other rural areas.

However, SCC SPU questions the inclusion of certain villages in the Key Service Village classification. Given the highly constrained nature of some of these villages by virtue of their small size and limited associated infrastructure, the ability of these areas to accommodate growth is low. It is considered that a more effective approach would be to remove the smallest and least well-served (both in terms of physical and service infrastructure) of these areas and instead direct further growth to the larger, better serviced villages / towns. This will ensure the Plan is more sustainable (i.e. new households served by existing infrastructure, sufficient services and a good highways network) and thus more viable. Moreover, focusing development in better-served areas also ensures for more cost-effective delivery of the key services that SCC and other infrastructure providers deliver (as new population growth will be focused in already established neighbourhoods which generally have better provision of key infrastructure and good proximity to essential services).

SCC SPU therefore questions the effectiveness of the inclusion of 11 different Key Services Villages and would argue that a more effective approach would be to differentiate between the larger key service villages (e.g. Gnosall and Eccleshall) and the smaller, less well-served ones. A potential approach therefore, would be to apportion the majority of growth to the larger Key Service Villages by way of a percentage delivery rate of the overall residual housing requirement for the Key Service Villages.

The Distribution of Housing Growth (Policy SP4)

The SBDPP states that the distribution of housing growth over the plan-period should be as follows:

- Stafford: 72%;
- Stone: 8%;
- Key Service Villages: 12%; and
- Rest of Rural Area: 8%.

Based on an average annual supply of 500 dwellings per year over the 20-year plan period, the approximate amount of housing that is expected to be delivered in each of the above areas is therefore as follows:

- Stafford: 7,200;
- Stone: 800;
- Key Service Villages: 1,200; and
- Rest of Rural Area: 800.

SCC SPU support the increase in the level of housing expected to be delivered in Key Service Villages compared to that of the Stafford Local Plan 2001. This reflects the documentary evidence that there is significant demand and need for housing in these locations; with particular need for affordable housing in rural areas.

However, in line with SCC SPU's comments on Policy SP3 above, it is requested that the least well-served villages which are included in the Key Service Villages classification are reassessed for their suitability. This is to ensure a more sustainable approach to population growth around the Borough - focusing development to areas already served by mature infrastructure (thus reducing associated costs to key service providers such as SCC and taxpayers more generally). This will also allow for comprehensively planned and designed new neighbourhoods which are sensible additions to already established areas.

Notwithstanding the above, it is especially important that SBC provide a robust strategic approach to the distribution of housing given the Borough's intention for local communities to drive forward the detail of the Local Plan via the Neighbourhood Planning process.

Site Allocations Process and the Need for an up-to-date Deliverable Supply of Housing Land

SCC SPU considers that the approach toward site allocations; particularly housing allocations is potentially ineffective in its current form.

It is understood that SBC will first wait to see if local communities wish to produce Neighbourhood Plans (and therefore allocate specific land for housing in their area) before producing a more traditional Proposals Map / Site Allocations document. SCC suggest that this may leave a policy vacuum in certain areas where neighbourhood plans are not forthcoming - and could result in developers promoting developments before either the local community or SBC has identified the most suitable location for housing development. This would create a period of unintended uncertainty for SBC, residents and developers.

Moreover, given the recent Castleworks Appeal Decision¹ in which the Planning Inspector confirmed that SBC did not have a 5 year housing land supply as required by paragraph 47 of the NPPF – SCC SPU consider that the need to identify deliverable housing allocations (above and beyond those identified in and around Stafford and Stone) at the SBDPP stage is necessary to ensure the Plan is effective.

If further housing allocations are not brought forward at the Local Plan stage, SCC SPU suggest that a target date should be set by SBC post adoption of the Local Plan before which neighbourhoods must signal their intention to create a Neighbourhood Plan. This can then guide SBC in understanding which areas will require the Borough Council's direct intervention in the form of a more formal site allocations process, giving greater certainty to developers and landowners – and importantly insuring that SBC can demonstrate a strong 5 year housing land supply. SBC should also set out explicitly, in the form of an additional Local Plan policy, the expectation that Neighbourhood Plans will first be sought before a formal Site Allocations process; with clear guidance on how planning applications for housing development submitted during this potential vacuum period will be determined. Alternatively, this could be in the form of an interim policy which provides clarity to developers and communities as to SBC's expectations for development where there is neither an adopted Neighbourhood Plan or the Site Allocations process has not been completed.

SCC SPU consider that if this potential vacuum period is not addressed it may have the unintended result of increasing uncertainty for local communities, developers and the Borough Council in relation to the delivery of housing; *something the Neighbourhood Planning process, the NPPF and Localism Act more generally seeks to avoid*. Moreover, given SBC's current 5 year housing land supply deficiency, it is considered ineffective to

¹ Appeal ref: APP/Y3425/A/12/2172968

delay the allocation of other deliverable housing sites above and beyond those already identified by SBC in-and-around Stone and Stafford.

Key Objective 17

Key Objective 17 is supported by SCC SPU, in that mixed use town centre proposals will be delivered to enhance the centre of Stone, providing retail, leisure and canal based community activities along the canal corridor. This will enable the positive regeneration of the canal corridor within Stone to be delivered.

Notification of Examination and Adoption

I can confirm that I wish to be notified of both of the following:

- (i) That the Plan for Stafford Borough DPD has been submitted to the Secretary of State for independent Examination; and
- (ii) That the Plan for Stafford Borough DPD has been adopted.

In line with the above request for notification, I can confirm that I wish to be in attendance at the Examination in Public Hearings to represent the Strategic Property Unit's interests.

Conclusions

In summary, the overall thrust of the Plan for Stafford Borough Development Plan Document Publication is supported, save for several matters which SCC SPU feel should be given further consideration at the EiP. These matters principally relate to the Plan's conformity with the NPPF's requirement to 'significantly boost the supply of housing'; and the potential ineffectiveness of the Plan in delivering on its housing requirements if the procedure of allocating land for development through the Neighbourhood Planning and Site Allocations process is not set out in further detail.

SCC SPU kindly requested that these representations are taken into consideration prior to the submission of the Local Plan to the Planning Inspectorate and that safe receipt is provided.

If you have any further queries, or should wish to discuss the representations in further detail, please do not hesitate to contact me.

Yours sincerely,



Jonathan Bloor
B.A. (Hons) MPLAN MRTPI
Strategic Property Unit



27 February 2013

Mr. Alex Yendole,
Forward Planning Section,
Stafford Borough Council,
Civic Centre,
Riverside,
Stafford
ST16 3AQ.

Clerk to the Council:
Mrs Catherine Gill
79, Sycamore Drive
Hixon
Stafford ST18 0FB
Tel: 01889 272679
Email: clerk@hixon.gov.uk
Web: www.hixon.gov.uk

Dear Mr Yendole

Hixon Parish Council wishes to make the following responses to Stafford Borough Council Revised Sustainability Appraisal Report January 2013 and the Plan for Stafford Borough Publication (pre-submission).

Hixon Parish Council requests that its previous responses to planning consultations in February 2008, April 2009, October 2011, May 2012 and July 2012 remain on file for future reference. Copies of these can be provided to Stafford Borough Council if required.

Hixon Parish Council's response in July 2012 to the Plan for Stafford Strategic Policy Choices agreed with:-

- The preferred approach to the development programme of 500 new houses and an additional 8 hectares of employment land each year over the twenty year period 2011 to 2031. Providing; ***“that new development beyond that County town of Stafford and the market town of Stone is, in so far as possible, proportionally distributed across the ten identified Key Service Villages.”***
- 30% affordable housing target
- Establishment of settlement and industrial area boundaries, providing; ***“no expansion or extension of existing settlement and industrial area boundaries should be allowed pending completion of the consultation process.”***

Hixon Parish Council's response in July 2012 to the Plan for Stafford Strategic Policy Choices objected to;

- The adoption of a criteria-based approach to housing distribution.
- The deletion or addition of Key Service Villages to the Sustainable Settlement Hierarchy.

Hixon Parish Council's response in July 2012 to the Plan for Stafford Strategic Policy Choices disagreed with:-

- The assertion that *'Hixon has good transport links to Stone.'*

In the Hixon Parish Council response to the Draft SPD Urban Design dated May 11th 2012 and LDF dated October 20th 2011 it welcomed "***the news that no additional industrial land will be required in Hixon.***"

It is against all previous responses by Hixon Parish Council that the response to the Stafford Borough Council Revised Sustainability Appraisal Report January 2013 and the Plan for Stafford Borough Publication (pre-submission) which follows is made.

Plan for Stafford Borough Publication (pre-submission). Housing Requirements.

There appears to be a degree of shifting sand when trying to analyse population growth forecasts and future housing demand, but at point 6.39 (Spatial Principle 4) it states that housing development for 10,000 properties between 2011 and 2031 are allocated thus:

- 72% in Stafford
- 8% in Stone
- 12% in Key Service Villages
- 8% in *'rest of rural areas'*

In Key Service Villages, 12% of 10,000 = 1200.

- At point 6.54 it is stated that, as at 31st March 2012, the number of completed and current commitments in Key Service Villages is 571, leaving a total of 629 properties to be completed before 2031. Hixon Parish Council reinforces its previous demand that this number of developments should be distributed proportionally across the ten identified Key Service Villages."

Notwithstanding the above, it is questionable whether the basis for the forecast number of developments is sound.

The projected demand for 10,000 new housing developments is based on Government's forecasts, (Point 6.11 refers) which projects a population in Stafford Borough of 146,000 in 2035. A percentage increase of 11.74% over the 2011 Census returns. Analysis of Census returns 2001 to 2011 shows that the increase population numbers was 9.7%. (Census 2001 = 119,100 and Census 2011 = 130,600).

At point 2.6 it states that overcrowding in properties in Stafford is low at 3%. The 2011 population of 130,600 in 2011 was housed in 56,055 properties giving an average occupancy of 2.33 people per property.

Assuming a house building programme of 10,000 properties before 2031, the total number of properties in Stafford Borough can assumed to be circa 65,000 to 66,000.

But the projected population figures (even to the questionable 2035 figure of 146,000 from the Government) would suggest that, at an occupancy rate of 2.33 people per household, the total number of properties would be circa 62,660. Over 3,000 less than the plan allows for. Statistically, a highly significant difference.

How is this justified?

Plan for Stafford Borough Publication (pre-submission). People living and working in Stafford.

- The report states that 39,000 (equating to 73%) of the 'economically-active' people living in Stafford Borough both live and work within the borough boundary.

This suggests that some 53,424 of Stafford borough residents are economically-active. Therefore, some 14,424 Stafford residents, who are economically-active, travel outside of the borough boundaries to their employment.

At point 4 .the report states that 40% of the (economically-active) population in Stafford borough is employed in public administration, health and education. However, it goes on to say that *'public administration, health, will in the coming years, contract due to Government-imposed austerity measures.'*

Given the clear threat to a cut in the present 40% public administrative employment opportunities in Stafford Borough, it can be assumed that fewer people with suitable public sector employment skills and experience will choose to live and work in Stafford borough in the future.

More importantly, the statistics reveal that of the 130,600 (Census 2011) Stafford borough residents 77,235 (59%) of the total population are currently not economically active. According to the report; in 2025 some 25% (34,800 projected) of the population of Stafford will be over 64 years of age. And, in the same period, the number of people aged 85 and over will double.

How will proposed new housing address the demographic profile of an aging population in Stafford while offering young and first time buyers a chance to get on the property ladder?

Employment land in Hixon

There are four industrial estates within the Hixon parish boundary;

- Hixon Airfield Industrial Estate
- New Road Industrial Estate
- Church Lane Industrial Estate
- Pasturefields (A51) Industrial area.

They are located on the main approaches into Hixon.

Previous research by Hixon Parish Council indicated that fewer than 10% of those working within these areas live in Hixon. Therefore, over 90% of employees travel to Hixon from outside the parish.

For information: Public transport in and out of Hixon is much as it was nearly forty years ago.: an hourly service to Stafford and Uttoxeter, no buses after 6pm and none at all on Sundays. This is despite almost a doubling of the housing stock and expansion of industrial estates onto agricultural land.

Within the Hixon Airfield Recognised Industrial Estate boundary there is some 9ha of undeveloped employment land available.

The report also states that 1 in 8 of current employment buildings in Stafford Borough is unoccupied.

For these reasons, Hixon Parish Council believes there is no case to expand employment land in Hixon. In addition, any further employment land allocation would give the impression of a large industrial estate with a village at its core. Further, Hixon has been described previously by Stafford Borough Council planners as “*a peripheral location which is not well-served by public transport or the strategic highways network, and consequently is unsuitable for the proposals for Class B1 (b) and (c), B2 and B8 development.*”

At point 6.59 in the Plan for Stafford report it shows that 15.4 ha of new employment provision is required outside of Stafford and Stone up to 2031. Hixon Parish Council contests that Hixon already has more than its fair share of industrial areas and that it makes more economic sense to locate new employment provision in other rural areas of Stafford where employment land does not exist.

Summary

This is the sixth response Hixon Parish Council has made to planning consultations from Stafford Borough Council. Each response has been carefully crafted to address the issues raised. There is a deep rooted feeling that the responses have not been acted upon and that the development process continues to roll on regardless.

The responses have been consistent in accepting a proportional share of new housing. The responses have also objected to the expansion of industrial land onto agricultural land in Hixon for the reasons given.

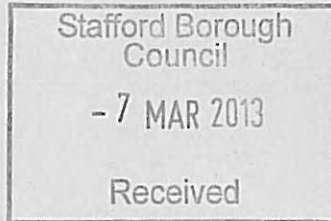
Hixon Parish Council trusts that this response will be acted upon.

Yours sincerely

Mrs Catherine Gill
Clerk to Hixon Parish Council

STONE RURAL PARISH COUNCIL

Council Office
Moddershall
Stone
Staffordshire
ST15 8TG
Office; 01785 811123
Mobile: 07886 291042
Email: clerk@stonerural.staffslc.gov.uk



Stafford Planning Dept
Stafford Borough Council

22 February 2013

To Head of Planning and Regeneration Services,

RE: the Plan for Stafford Borough – Publication (Pre Submission Documents)

I have tried to download the Representation Form, but unfortunately it is not downloading properly, hence this letter.

Stone Rural Parish Council wish to raise the following three points:

1. It is concerned at the proposed development at Westbridge Park for use other than that at present.
2. It does not believe that the development publicised is necessary given the existing facilities in Stone.
3. It believes that should it be shown in the new Local Plan for Stafford Borough that further retail and other development is needed by the population of Stone, then it should be elsewhere than Westbridge Park.

Yours sincerely,

A white rectangular redaction mark covering the signature area of the letter.

Tracey Smith
Parish Clerk

Forward
Planning



Planning Services, Stafford Borough Council,
Civic Centre,
Riverside,
Stafford. ST16 3AQ.

27th February 2013

Dear Mr Holmes,

Re: Top Farm, Barlaston. The Plan for Stafford Borough. Support to SP3 and objection at lack of reference to alteration to Green Belt / Settlement Boundary for Barlaston

I write on behalf of my client Mr and Mrs Hill.

They appreciate that the Council is examining strategic direction at this stage and that their interest is in many respects local to their community of Barlaston. However they feel that there are a few issues upon which they wish to comment at this stage in order to avoid matters which they consider key being omitted. They support Barlaston's inclusion as a key settlement (Policy SP3) is correct given the large size of the village, its broad range of services, employment, its excellent public transport connectivity and its proximity to the conurbation.

Their comments relate to the following:

- a Support for the inclusion of Barlaston in the list of Key Settlements as identified by policy SP3. This is considered to be sound.

- b The failure to consider or discuss logical alterations to the Green Belt and Settlement Boundaries. This omission is considered to be unsound.
- c Lack of evidence of how the Plan can fulfill objectives 21 and 25 of "The Plan". This lack of policy that can deliver on stated objectives it is considered makes the plan unsound.

In respect of these points the following can be said:

- a **Support for the inclusion of Barlaston in the list of Key Settlements as identified by Policy SP3.**

The Council wishes to support organic development in key villages in order to support sustainable development in the rural area. My client supports this approach as it accords with national planning policy and sustainable principles

Development within Barlaston will comply with national planning policy as it will support the vitality of the village in a sustainable manner. Development on suitable and available land will assist in retaining local services and infrastructure. The NPPF advises the following in respect of rural housing:

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as:

- *the essential need for a rural worker to live permanently at or near their place of work in the countryside; or*

- *where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or*
- *where the development would re-use redundant or disused buildings and lead to an enhancement to the immediate setting; or*
- *the exceptional quality or innovative nature of the design of the dwelling. Such a design should:*
 - *be truly outstanding or innovative, helping to raise standards of design more generally in rural areas;*
 - *reflect the highest standards in architecture;*
 - *significantly enhance its immediate setting; and*
- *– be sensitive to the defining characteristics of the local area.”*

The broad strategy with within SP3 accords with the NPPF.

b The failure to consider or discuss logical alterations to Green Belt and settlement boundaries.

The NPPF gives directions of defining Green Belt boundaries. It states the following:

“85 When defining boundaries, local planning authorities should:

ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;

not include land which it is unnecessary to keep permanently open;

where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the Plan period;

make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;

satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and

define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

In the case of Barlaston and the Green Belt boundary adjacent to and running across my client's site. The present Green Belt boundary and that which the Council, it is thought, intends to include with the Plan does not accord with the directions within NPPF. The boundary needs to be redrawn to reflect real and recognisable physical features. Pictures of these are attached at Appendix 3. The present location of the Green Belt supported by the Council is not identifiable and does not comply with NPPF. This makes the plan unsound.

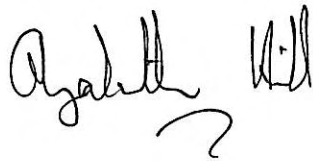
c Lack of evidence of how the plan can fulfill objectives 21 and 25 of "The Plan"

It is appreciated that "The Plan" is a strategic document. However it is considered that the Plan fails to show how it can meet its objectives for the rural parts of the Borough. It could have done this better by identifying at this stage either on a plan or in text with policy as to how its objectives for growth in key settlements could be accommodated. Its failure to do this renders the plan ineffective in this policy area and therefore unsound.

Finally. The questionnaire (question 9) seeks justification for attendance at the EIP. My client does wish to take part in the EIP. They believe that their comments are properly based and raise issues of

the formation and application of effective and sound policy for the rural part of the Borough. They wish to raise these matters with the inspector.

Yours Sincerely

A handwritten signature in cursive script, appearing to read 'Gerald Willard', followed by a large flourish.

PP

Gerald Willard M.R.T.P.I

Appendix A

Key Extracts from "The Plan"

19. Safeguard and enhance the landscape setting through new green infrastructure provision and habitat creation including supporting the role of the Trent Valley corridor through the town in terms of biodiversity, accessibility, recreation and community uses

20. Conserve and enhance the historic character and heritage assets of Stone and secure the sustainable use and management of its historic buildings

Key Objectives - Areas outside of Stafford & Stone

21. Provide for high quality new small scale housing development at appropriate villages that reflects their distinctive local character

22. Deliver sensitive additional facilities to provide an improved level of local services appropriate to settlements, reduce the need to travel and be in keeping with the local character, the historic environment and the rural setting

23. Provide increased rural employment through agricultural and livestock businesses, renewable energy schemes, low impact hi-tech industries in agricultural buildings and sensitive new tourist attractions that enhance the high quality environment of the area

24. Deliver new employment land through the expansion of existing industrial areas

25. Provide new high quality homes, including new affordable homes, on appropriate sites in existing villages, to support sustainable rural communities in the future

26. Support increased habitat maintenance, restoration and creation, and the encouragement of a diverse range of species as part of the strategic green infrastructure network across the Stafford Borough area, whilst also protecting designated sites, including the Special Areas of Conservation

27. New open space, sport and recreational facilities to meet the needs of the community, including through increased multi-use provision such as community halls

28. Encourage the sustainable management of heritage assets, especially those identified as at risk, and deliver development which respects local character and distinctiveness

5.3 Based on the Spatial Vision and Key Objectives set out above the following development strategy is proposed for the Stafford Borough area to deliver new development proposals. The National Planning Policy Framework sets out core planning principles to underpin plan-making and decision-taking, which will guide the Local Plan policies. Taking forward the Spatial Strategy identified above will be achieved through a number of strategic spatial principles and policies, which will translate the vision and objectives into action and a strategic direction for the Plan during the period to 2031.

SPATIAL PRINCIPLE 1 (SP1) - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants and communities jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

i. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

ii. Specific policies in that Framework indicate that development should be restricted.

SPATIAL PRINCIPLE 3 (SP3) – STAFFORD BOROUGH SUSTAINABLE SETTLEMENT HIERARCHY

The majority of future development will be delivered through the Sustainable Settlement Hierarchy based on the following areas:

1. County Town of Stafford

2. Market Town of Stone

3. Key Service Villages of Eccleshall, Gnosall, Hixon, Great Haywood, Little Haywood / Colwich, Haughton, Weston, Woodseaves, Barlaston, Tittensor and Yarnfield

SPATIAL PRINCIPLE 4 (SP4) – STAFFORD BOROUGH HOUSING GROWTH DISTRIBUTION

In order to achieve the scale of new housing identified in Spatial Principle SP2, the annual targets for the distribution of housing development, supported by necessary infrastructure, will be:

- Stafford 72%*
- Stone 8%*
- Key Service Villages 12%*
- Rest of Rural Area 8%*

SPATIAL PRINCIPLE 6 (SP6) – ACHIEVING RURAL SUSTAINABILITY

Priority will be given to supporting the rural sustainability of the Borough by protecting and enhancing its environmental assets and character whilst sustaining the social and economic fabric of its communities. This will be achieved by promoting:

- i. A sustainable rural economy*
- ii. Conservation or improvement of the rural environment*
- iii. Appropriate rural housing schemes to achieve sustainable communities*
- iv. The appropriate re-use of redundant buildings*
- v. Use of sources for renewable energy.*

SPATIAL PRINCIPLE 7 (SP7) – SUPPORTING THE LOCATION OF NEW DEVELOPMENT

Settlement Boundaries will be established for the Sustainable Settlement Hierarchy defined in Spatial Principle SP3. Development or activities of a scale and nature appropriate to secure the sustainability of each settlement will be supported within the Settlement Boundaries.

Development in other locations (in settlements or in the countryside) will only be supported where:

- i) if located within the Green Belt, it is consistent with national policies for the control of development, and Policy E5;*
- ii) it is consistent with the objectives of Spatial Principles SP6 and Policy E2 in supporting rural sustainability;*
- iii) it does not conflict with the environmental protection and nature conservation policies of the Plan;*
- iv) Provision is made for any necessary mitigating or compensatory measures to address any harmful implications.*

Settlement Boundaries will be established in accordance with the following criteria. Prior to the establishment of the actual boundaries these principles will be used to assess the acceptability of individual proposals at the Key Service Villages. Settlement Boundaries will be defined to ensure that development within that boundary will, in principle, be acceptable because it:

- a) is in, or adjacent to, an existing settlement;*
- b) is of an appropriate scale to the existing settlement;*
- c) is accessible and well related to existing facilities;*
- d) is accessible by public transport, or demonstrates that the provision of such services could be viably provided;*
- e) is the most sustainable in terms of impact on existing infrastructure, or demonstrate that infrastructure can be provided to address development issues;*

f) will not impact adversely on the special character of the area, including not impacting on important open spaces and views, all designated heritage assets including, Listed Buildings, Conservation Areas and locally important buildings, especially those identified in Conservation Area Appraisals;

g) will appropriately address the findings of the Landscape Character Assessment, and the conservation and enhancement actions of particular landscape policy zone / zones affected;

h) will not lead to the loss, or adverse impact on, important nature conservation or biodiversity sites;

i) will not lead to the loss of locally important open space or, in the case of housing and employment, other locally important community facilities (unless adequately replaced);

j) will not be located in areas of flood risk or contribute to flood risk on neighbouring areas;

k) will ensure adequate vehicular, pedestrian and cycle access as well as cycle and short stay parking facilities on the site; and

l) will not adversely affect the residential amenity of the locality.

Development proposals should maximise the use of brownfield redevelopment sites within the Borough's towns and villages to reduce the need for greenfield sites. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet new development requirements should greenfield sites be released.

Policy C5

Residential Proposals outside the Settlement Hierarchy

A. New Development

In areas outside of Settlement Boundaries, as defined in Spatial Principle SP7, proposals for new residential development will need to meet the criteria listed in SP7, together with all of the following criteria:

1. It is demonstrated that provision can not be accommodated within the Settlement Hierarchy (Spatial Principle SP3);
2. The housing is justified by a Parish based Local Housing Needs Assessment, and an appraisal of the scheme, proving that it will meet the defined needs, shall accompany any planning application;
3. The development is of a high quality design that reflects the setting, form and character of the locality and the surrounding landscape;

Affordable housing will be permitted on 'rural exception sites' provided that it meets the following criteria:

- a. The site is well related to existing development by being within or adjacent to an existing settlement;
- b. The site delivers 100% affordable housing (defined as social rented, affordable rented and intermediate housing) in perpetuity (there is no Right to Buy or Right to Acquire on rented properties and that shared ownership sales and re-sales are capped at 80%);
- c. Provide an element of specialist housing, subject to local need;
- d. The housing is justified by a Parish based Local Housing Needs Assessment;

Housing is to be justified on the grounds of local needs, unless the initial and subsequent occupancy of such developments is controlled through planning agreements or conditions via a Registered Provider, to ensure that the accommodation remains available in perpetuity, to meet the need for which it was permitted.

The occupants of affordable housing must be able to demonstrate they are in local housing need and unable to access the housing market. Each occupant of rural exception housing must demonstrate that they are unable to secure or maintain a dwelling in the open market, due to lack of available capital or income.

B. Replacement Dwellings

In areas outside of Settlement Boundaries as defined in Spatial Principle SP7, proposals for a replacement dwelling will be supported if all of the following criteria are met:

- a. The present dwelling has a lawful unrestrictive residential use and is not in a state of abandonment, partial or complete demolition or collapse;
- b. The present dwelling is not the result of a temporary planning permission, a temporary form of construction or a caravan / mobile home;

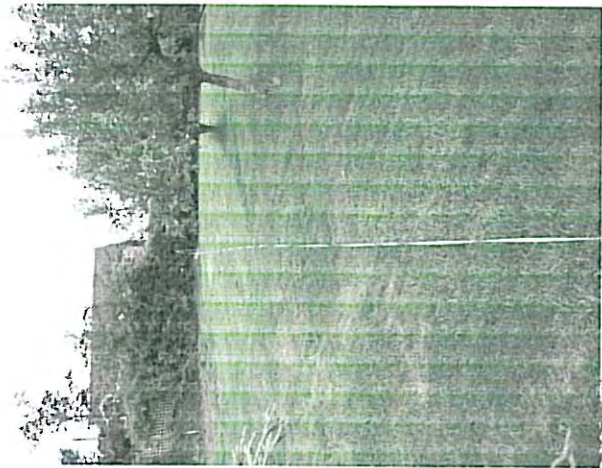
Appendix B

Suggested revised Green Belt and settlement boundary to Barlaston



Appendix C

Clear Physical features that ought to be used to define settlement boundary



Bottom: Photograph 1 Lawn to west of drive at 75, Longton Road, Barlaston.
Tape indicates line of Rural Development Boundary as shown on Stafford Borough Local Plan Proposals Map, Inset 4 2001 - 1998.

Left: Photograph 2.

Looking north along the line towards the shed.

Right: Photograph 3.

Looking south along the line towards the fence between house numbers 92 + 98.



Left: Photograph 4
Boundary of green belt / village envelope shown by tape taken from Local Plan Proposals Map, Inset 4, Barlaston.



Below: Photograph 5
Edge of garden to No 75, Longton Road, Barlaston from the public footpath.



Representations Form

(For official
use only)

Please return completed forms to:

- Head of Planning & Regeneration, Stafford Borough Council, Civic Centre, Riverside, Stafford, ST16 3AQ
- or by email to forwardplanning@staffordbc.gov.uk
- or by fax to: 01785 619473

Responses must be received by 12 noon on Thursday 28th February 2013

This form has two parts:

Part A: Personal Details

Part B: Your representations.

- Please complete Part B of this form for each representation you wish to make. You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached guidance notes on making representations so that they address issues of legal compliance and / or soundness.
- Please note that when representations are submitted only Part B of the form will be published. Contact details on Part A will not be published.

Part A

1. Personal Details*

2. Agent's Details (if applicable)

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

Title	MR + MRS	MR
First Name	GARNAM + ELIZABETH	G.
Last Name	HILL	WILLARD
Job Title (if applicable)	SOLICITOR + LANDSCAPE ARCHITECT	DIRECTOR - PLANNING.
Organisation (if applicable)		WILLARDWILLARD LTD
Address Line 1	TOP FARM	PARADISE FARM,
Address Line 2	75, LONGTON ROAD	MAIN ROAD
Address Line 3	BARLASTON	HOLLINGTON
Address Line 4	STOKE ON TRENT	STAFFORDSHIRE
Postcode	ST12 9AU	ST10 4HX
Telephone Number	01782 373992	07876 022365

6. Please give details of why you consider The Plan for Stafford Borough is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of The Plan for Stafford Borough, please also use this box to set out your comments.

See attached

(attach separate sheets as necessary)

7. Please set out what change(s) you consider necessary to make The Plan for Stafford Borough legally compliant or sound, having regard to the test you have identified at question 5. You will need to say why this change will make the document legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

see attached

(attach separate sheets as necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation.

After this stage, further submissions will only be at the request of the Planning Inspector, based on the matter and issues he / she identifies for examination

8. If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public?

a. Yes I wish to participate at the Examination in Public



Yes.

b/ No I do not wish to participate at the Examination in Public

9. If you wish to participate at the Examination in Public, please outline why you consider this to be necessary

see attached letter.

(attach separate sheets as necessary)

Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the Examination in Public

Please ensure you have printed your name or organisation at the top of this form



Representations made within the consultation period will be considered alongside The Plan for Stafford Borough: Submission as part of an examination by an independent planning inspector. The purpose of the examination is to establish whether the plan has been prepared in accordance with legal requirements, and whether it is sound.

Representations should therefore focus on legal compliance and soundness. If you wish to make a comment seeking to change The Plan for Stafford Borough you should make clear in what way you consider it is not legally compliant or sound. You should try to support your comment by providing evidence and supporting information showing why it should be changed. It will be helpful if you also say precisely how you think it should be changed.

For the plan to be legally compliant it must:

- be prepared in accordance with:
 - the Council's Local Development Scheme (a timetable for plan preparation);
 - the Council's Statement of Community Involvement (which includes the Council's policy for community engagement on The Plan for Stafford Borough) and
 - relevant Acts and Regulations; in particular the Town and County Planning (Local Planning) (England) Regulations 2012;
- have been subject to sustainability appraisal;
- have regard to:
 - national policies, advice and guidance issued by the Secretary of State; and
 - the Stafford Borough Sustainable Community Strategy and Stafford Borough Community Action Plan;
- be in general conformity with the Regional Spatial Strategy for the West Midlands;
- meet legal requirements under the Duty to Co-operate (introduced via the Localism Act 2011).

Soundness is explained in the National Planning Policy Framework. For a plan to be sound it must be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
- **Justified** – the plan should be the most appropriate strategy based on a robust and credible evidence base;
- **Effective** – the plan should be deliverable over its period;

- **Consistent with national policy** - the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Where there are groups who share a common view on how they wish to see The Plan for Stafford Borough changed, it would be very helpful for that group to send a single comment rather than for a large number of individuals to send in separate comments which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.