

Planning Strategy Statement

Event Name	Planning Strategy Statement
Comment by	Mr Rodger Whittaker
Comment ID	PSS1
Response Date	19/04/13 12:28
Consultation Point	Planning Strategy Statement (View)
Status	Processed
Submission Type	Web
Version	0.2

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? No

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not: . Positively prepared

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

All Officers now know the details of the proposed HS2 rail track, its height, intrusion aspect, noise levels. and destruction of rare and valuable land. The Officers, employed to work on behalf of Stafford Citizens, know the strong anti-HS2 feelings of the population. None of these factors is mentioned, or discussed in the Documents. Why?

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. 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 precise as possible.

For once talk to the peoples of Stafford, by referendum if required! Do not sit patiently in the Boss's Office!

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If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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

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

Simply to put forward the views of a Stafford Resident

Planning Strategy Statement

Event Name	Planning Strategy Statement
Comment by	Davies
Comment ID	PSS2
Response Date	28/04/13 11:30
Consultation Point	1.1 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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The English used is unclear to me. It may be clear to the write what it is about. Who or what is Clarke's Farm ?

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Consult with the plain english campaign. Your approach gives me the impression you are trying to distract me from what the real issues are. I expect you are of the opinion that SBC are presenting the information in a clear and open manner. You are not , to the un-informed reader. As a member of the public I do not have the time to wade through all the supporting documents. I barely have time to read the core text.

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No, I do not wish to participate at the examination in public

Planning Strategy Statement

Event Name	Planning Strategy Statement
Comment by	Davies
Comment ID	PSS3
Response Date	28/04/13 11:35
Consultation Point	3.1 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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Utter rubbish , again. SBC should give much more consideration to the existing shopping provision (ie greengate st) AND the implications these new developments will have on exsisting employment. The only call for such largescale building work of to do with the MOD influx due in the next few years.

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	MR DAVID TURNER
Comment ID	PSS4
Response Date	12/05/13 10:10
Consultation Point	2 Sustainability Appraisal (View)
Status	Processed
Submission Type	Web
Version	0.2

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? No

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Consistent with national policy

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

YOU ARE EXPECTING THE READER TO BE LEGALLY COMPETENT IN THESE MATTERS. THE ASSUMPTION IS THAT WITHOUT THIS KNOWLEDGE THERE IS DOUBT. OTHERWISE, HOW CAN YOU OBJECT TO THE LEGAL ASPECT OF THE PLANS THEMSELVES?

THE PLANS ARE UNSOUND BECAUSE I CANNOT SEE WHERE IT MEETS;-

a) Infrastructure requirements of;-

- Social mobility; road improvements, extra requirements for bus additions and stops.
- Environmental loss of Green Spaces , as a result of Industrial and Housing Development.

b) Economic requirements for;-

- The need of extra shops within the 500 housing plan for Stone, plus those proposed on the Rugby field at Tilling Drive.
- Extra school places and traffic wardens needed should the plans go ahead.

c) Resource requirements of;-

- Extra Medical care needed in light of the developments of both Industrial and Housing.
- Improved amenities like drainage, lighting and communal facilities.

ABOVE ALL THERE IS NO INFORMATION ON HOW THE EXISTING LOCAL RESOURCES AND INFRASTRUCTURE CAN COPE, BOTH IN STAFFORD AND STONE AS A RESULT OF ALL THE PROPOSED DEVELOPMENT.

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Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	MR DAVID TURNER
Comment ID	PSS5
Response Date	13/05/13 09:03
Consultation Point	Planning Strategy Statement (View)
Status	Processed
Submission Type	Web
Version	0.2

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Do you consider that the document is Sound? No

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- . Justified

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THE NEW HOUSING DEVELOPMENTS DO NOT SEPARATE OUT THE NEED FOR SOCIAL HOUSING AS WELL AS PRIVATE DWELLINGS.

THE VAGUENESS OF NOT SPECIFYING THE TYPES OF DWELLINGS PROPOSED, BOTH IN STAFFORD AND STONE, CANNOT BE CONSIDERED LEGALLY COMPLIANT.

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SPECIFY THE TYPES OF HOUSING PROPOSED SO THAT THE PUBLIC CAN CONSULT AND GIVE OPINION WITHOUT THERE BEING DARK AREAS.

BE MORE TRANSPARENT IN PLAIN DETAILED ENGLISH FOR THE PUBLIC TO HAVE A FAIR AND OPEN DISCUSSION OF THE PROPOSALS.

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If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? No, I do not wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	MR DAVID TURNER
Comment ID	PSS6
Response Date	13/05/13 09:29
Consultation Point	1 What is the purpose of this paper? (View)
Status	Processed
Submission Type	Web
Version	0.2

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? No

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Justified
- . Effective

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

THE PURPOSE OF THE DOCUMENT IS TO INFORM, IN AS MUCH DETAIL AS IT NEEDS TO, THIS IN ORDER FOR THE PUBLIC TO MAKE AN INFORMED DECISION.

THE CONSULTATION DOCUMENT FAILS IN THIS RESPECT SINCE IT LEAVES MANY UNANSWERED QUESTIONS.

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DO NOT COVER UP THE HISTORIC MISTAKES MADE BY THE COUNCIL AND ITS OFFICERS, BE OPEN. EXAMPLES:-

1. RECENT FLOODING ON THE A34 NORTH OF STONE WAS BLAMED ON THE NEARBY CULVERT.

WHILST THIS MAY BE THE OUTCOME OF THE PROBLEM. IT CAN BE TRACED BACK TO THE DEVELOPMENTS OF;-

A) THE EXTENDED WHITEBRIDGE INDUSTRIAL ESTATE .

B) HOUSING DEVELOPMENT ON THE FORMER FAIRY INDUSTRIAL ESTATE ON THE A34 CALLED 'THE WILLOWS'.

NO ADDITIONAL DRAINAGE WAS ALLOWED FOR BEFORE, DURING AND AFTER THESE ADDITIONS.

AS A MEMBER OF THE PUBLIC, RESOURCE IMPLICATIONS OF SUCH DEVELOPMENTS ARE IMPORTANT. THE CURRENT PLAN FOR STAFFORD BOROUGH IGNORES THE STAIN THE CURRENT PROPOSALS WILL PUT UPON THE EXISTING DRAINAGE INFRASTRUCTURE .

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No, I do not wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Ingestre with Tixall Parish Council (Dr Anne Andrews)
Comment ID	PSS7
Response Date	12/05/13 19:32
Consultation Point	Planning Strategy Statement (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Ingestre response attachment.pdf

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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

The Parish Council is concerned that the Planning Strategy Statement which is currently out to consultation notes in 3.4 that newdevelopment east of Stafford can deliver a Strategic Development Location as a logical extension towards Blackheath Lane both north and south of Tixall Road. Representatives of the Parish Council attended the recent public exhibition regarding plans for this development, and subsequently received further information from Beattie Communications. The proposal to take traffic to St Thomas Lane and then across the Sow Valley is totally unacceptable. We fully support the views of John Martin who lives at St Thomas Priory Farmhouse, that installing traffic lights at the bridge by St Thomas Priory and the Canal Bridge will further impede traffic flows and result in gridlock. The Parish Council is extremely concerned that this development should not proceed until the Beaconside extension is completed at least as far as the other side of the Sow Valley. The additional traffic generated by this development and the proposed extension of the Beaconside Industrial Park will only exacerbate the current problems in Blackheath Lane and the crossroads by the Crematorium. A large amount of commuter traffic from the Haywoods, Rugeley and beyond uses Tixall Road to gain access to Stafford and the Eastern bypass from the University to the Stone Road. In addition traffic to and from Baswich and Cannock uses Baswich Lane and Blackheath Lane. This traffic will not be significantly reduced by the proposed additional bus service. While we welcome the new roundabout at the junction of Blackheath Lane and the Weston Road, we are concerned that merely improving the lights by the Crematorium will not solve the problem. We strongly support your statement that: "... further away from Stafford, the open countryside beyond Blackheath Lane is a prominent landscape including views toward the Cannock Chase Area of Outstanding Natural Beauty, historic character, undulating high topography as well as being close to the Brancote Sewage Treatment Work, " and therefore not suitable for further development. We are also confused that the revised Sustainability Appraisal Report refers to potential development at Clarkes Farm, without specifying where this is.

Clarkes owned the land on the Weston Road now being developed as an extension to the Beaconside Industrial Park and we would strongly oppose any further residential development here.

INGESTRE WITH TIXALL PARISH COUNCIL

Tel: 01785 246101
Email: Tixandrews@madasafish.com

Copy to: Staffordshire Highways
Stafford BC Planning
Cllr. Len Bloomer
Cllr F.Finlay
Cllr.R.Stephens

2, The Hanyards,
Tixall,
Stafford, ST18 OXY

12th May 2013

Dear Ms Walker,

The Parish Council noted that you had written to our Councillors who were able to attend your public exhibition regarding plans for residential development to the east of Stafford, 14.3.2013.

The Parish Council is extremely concerned that this development should not proceed until the Beaconside extension is completed at least as far as the other side of the Sow Valley. The additional traffic generated by this development and the proposed extension of the Beaconside Industrial Park will only exacerbate the current problems in Blackheath Lane and at the crossroads by the Crematorium.

A large amount of commuter traffic from the Haywoods, Rugeley and beyond uses Tixall Road to gain access to Stafford and the Eastern bypass from the University to the Stone Road. In addition traffic to and from Baswich and Cannock uses Baswich Lane and Blackheath Lane.

This traffic will not be significantly reduced by your proposed bus service to and from your site.

The proposal to take traffic to St Thomas Lane and then across the Sow Valley is totally unacceptable. We fully support the views of John Martin who lives at St Thomas Priory Farmhouse, that installing traffic lights at the bridge by St Thomas Priory and the Canal Bridge will further impede traffic flows and result in gridlock.

We note that you appear to propose a new access through Stafford Crematorium to Blackheath Lane.

While we welcome the new roundabout at the junction of Blackheath Lane and the Weston Road, we are concerned that merely improving the lights by the Crematorium will not solve the problem.

Yours sincerely,

Dr Anne Andrews (Parish Clerk)

Victoria Walker, Director
Beattie Communications, 4 Church Walk, Leeds, LS2 7EG

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	MR DAVID TURNER
Comment ID	PSS8
Response Date	15/05/13 09:34
Consultation Point	3 Stafford Town ? Other 'Reasonable' Alternative Locations (View)
Status	Processed
Submission Type	Web
Version	0.2

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? No

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified
- . Effective

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IT DOES NOT REFLECT SOCIAL,ENVIRONMENTAL,AND ECONOMIC FACTORS.

SOCIALLY THE STAFFORD HOSPITAL IS THE SUBJECT OF A DOWNGRADE AND YOU PROPOSE MORE DEVELOPMENT WITHOUT CONSIDERING THE ADDITIONAL MEDICAL REQUIREMENTS OF THE AREA.

ENVIRONMENTALLY, STAFFORD TOWN ITSELF IS STRANGLERED BY ROADWAYS AS A RESULT OF POOR PLANNING DECISIONS IN THE PAST.THE OUTCOME IS TRAFFIC BOTTLENECKS CAUSED BY THE TWO LARGE ISLANDS TO THE SOUTH AND NORTH OF TOWN WHERE ALL ROADS LEAD.

ECONOMIC,THE INFUX OF 1500 HUNDERD TROOPS IN 2015 TO THE MINISTRY OF DEFENCE LAND EAST OF STAFFORD, IS THE ONLY SUSTAINABLE DEVELOPMENT,WITH THE CURRENT RESTRAINTS ON PUBLIC FUNDING.

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SUPPORT AND ACTIVELY SEEK TO PROVIDE ADDITIONAL GENERAL DOCTORS SURGERIES, COMMUNITY WELFARE AND WELLBEING CENTRES TO THOSE CURRENTLY IN THE BOROUGH .

OUTWARDLY IN YOUR PLANS PUT INTO PLACE IMPROVED INFRASTRUCTURE BEFORE MORE PROPOSED DEVELOPMENT TAKES PLACE;-

- CONTINUE THE EASTERN BYE PASS ONTO THE A34 TOWARDS BASWICH.

- IMPROVE THE EXISTING ROAD NET WORK TO THE WEST OF STAFFORD TOWN.

- REPLACE THE EXISTING DRAINAGE WITH MUCH LARGER MAINS DRAINS ,PARTICURLARY AROUND THE SANDON ROAD AREA TO ACCOMMODATE THE NEW HOUSING NEEDED FOR THE TROOPS.

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No, I do not wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Highways Agency (Mrs Lisa Maric)
Comment ID	PSS9
Response Date	16/05/13 16:17
Consultation Point	Planning Strategy Statement (View)
Status	Processed
Submission Type	Email
Version	0.3
Files	HA response to PSS ASA 16 May 2013.pdf

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

Our ref: SHARE/LDF/SBC/PST & SAA
Your ref:

Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Mrs Lisa Maric
Asset Manager
9th Floor
The Cube
199 Wharfside Street
Birmingham B1 1RN

Direct Line: 0121 678 8019

Fax: 0121 678 8559

For the attention of Forward Planning

16 May 2013

Dear Sir/Madam

**PLANNING STRATEGY STATEMENT & SUSTAINABILITY APPRAISAL
ADDENDUM**

The Highways Agency welcomes the opportunity to comment on the Sustainability Appraisal Addendum and the Planning Strategy Statement in the context of the Publication version of The Plan for Stafford Borough. The Highways Agency made representations to the Publication document in February 2013.

The Highways Agency has reviewed the documents and notes the conclusions which have been made about the alternative sites. The documents and their conclusions do not change the Highways Agency's position with regards to the Publication Local Plan as set out in our letter of 26 February 2013.

Thank you for continuing to keep the Highways Agency informed of the progression of the Local Plan.

Yours sincerely



Mrs Lisa Maric
Network Delivery and Development Directorate - East Midlands
Email: lisa.maric@highways.gsi.gov.uk

cc: Derek Jones – JMP

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	MR DAVID TURNER
Comment ID	PSS10
Response Date	17/05/13 09:03
Consultation Point	4 Stone Town ? Other 'Reasonable' Alternative Location (View)
Status	Processed
Submission Type	Web
Version	0.2

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Do you consider that the document is Legally compliant? No

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

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Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified

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LEGALLY NOT OPEN AND FAIR.

THIS WHEN YOU EXPECT THE PUBLIC TO COMMENT ON THE ALTERNATIVES, WHERE YOU ACCEPT PART OF THE AREA IS SUBJECT TO FLOODING,WHILST IT IS COMMON KNOWLEDGE THERE ARE ISSUES WITH THE FLOOD PLAIN AT FILLY BROOK.

UNSOUND.

THERE IS NOT ENOUGH IN THE HOUSING PACKAGE PROPOSED FOR THE DEVELOPMENT OFF THE ECCLESHALL ROAD.

EXTENDING THIS URBAN AREA TAKES AWAY THE CALM AND CONTENTMENT TO THOSE IN EXISTING PROPERTIES,WHILST NOT MENTIONING ANYTHING ABOUT THE INCREASED MEDICAL SERVICES AND DRAINAGE REQUIREMENTS,

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WHILST THE NEW DEVELOPMENT TO THE BUSINESS PARK ENCOURAGES JOB VACANCIES, IT DOES NOT STATE THE TYPE OF JOBS PREFERRED.

STONE REQUIRES REAL JOBS THAT PAY SKILLED RATES OF PAY, NOT MORE WAREHOUSING/DISTRIBUTION CENTRES THAT ARE RELATED TO LOWER RATES OF PAY.

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Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	MR DAVID TURNER
Comment ID	PSS11
Response Date	17/05/13 09:17
Consultation Point	4.1 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

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NOT COMPLIANT IN MEETING THE SOCIAL, ENVIRONMENTAL AND ECONOMIC CRITERIA FOR SUSTAINABILITY OF THE AREA.

THE ELECTED OFFICERS OF THE BOROUGH COUNCIL ARE KNOWN NOT TO AGREE WITH THE FINDINGS OF THEIR OWN EXPERTS; EG;- BUILDING ON OR NEAR TO FLOOD PLANES.

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WHERE FLOOD PLANES ARE WITHIN PART OF THE PROPOSALS, MAKE AVAILABLE TO THE PUBLIC INTERNAL REPORTS ON THE HISTORICAL ISSUES.

A SETTLING LAKE , PROPOSED AS PART OF THE 500 NEW HOME DEVELOPMENT OFF THE ECCLESHALL ROAD MAY NOT BE A SUFFICIENT SAFEGUARD AGAINST FLOODING.

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Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	MR DAVID TURNER
Comment ID	PSS12
Response Date	17/05/13 09:34
Consultation Point	4.2 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

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THE PLANNERS AND ELECTED OFFICERS ARE NOT BEING OPEN AND FAIR ABOUT THE SITUATION REGARDING THE TYPES OF HOUSING, SIMPLY TO SAY 500 NEW HOMES IS NOT GOOD ENOUGH.

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STATE IN YOUR PLANS THE TYPES OF HOUSING YOU WISH THE DEVELOPERS TO BUILD BASED ON THE LOCAL ECONOMIC SCENE.

IN STONE PRIVATE HOUSES ARE NOT SELLING AND REMAIN EMPTY,WHAT IS REQUIRED ARE HOUSES TO STATISFY PEOPLE ON THE WAITING FOR IMMEDIATE POSSESSION

PRIVATE HOUSES HAVE NOT ALL SOLD AT ;-

THE WILLOWS ON THE A34,NORTH OF STONE TOWN CENTER,OR ON THE SITE OF THE OLD LAMP PUB IN LAMB LANE OFF THE ECCLESHALL ROAD.

THERE IS A NEED FOR MORE 1 AND 2 BEDROOM SOCIAL HOUSING TO ACCOMMODATE THE TRANSFER OF THOSE IN LARGER HOMES,BOTH NATIONALLY AND IN STONE.

IF THIS TYPE OF HOUSING WAS TO BE RECOMMENED BY THE PLANNERS AND COUCILLORS,THEN I FOR ONE WOULD BE POSITIVE TOWARDS THE DEVELOPMENT PLAN.A RECOMMENDATION THAT WOULD FULFILL AN EXISTING NEED.

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 Inspectorate, based on the matter and issues he / she identifies for examination

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

No, I do not wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Mr Murrey Preston
Comment ID	PSS13
Response Date	28/05/13 09:48
Consultation Point	4.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.4

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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

We wholeheartedly support and approve of the new Stafford Borough Green Infrastructure Strategy, the designations and precise coverage on the Green Infrastructure Map for Stone Town and the creation and designation of the Stone Canal and Riverside Park and the precise area it covers.

The protection of this delightful and much-loved 'green lung' in the centre and on the edge of the town completely embraces sustainability for very many reasons.

We support and approve of the Residential Development Boundary for Stone as drawn and ask that it is not violated in even the slightest degree.

Whilst writing we are very grateful to you for affording us this opportunity to respond to what we perceive is an excellent Planning Strategy Statement and would like to warmly congratulate everyone concerned with its production.

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PSS14
Response Date	29/05/13 16:14
Consultation Point	1.1 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.4

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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

Creswell Parish Council understands that this Addendum deals specifically with the additional area proposed for residential purposes known as "Clarke's Farm (north east of Stafford); and that it also take the opportunity with matters concerning land to the west of the M6 motorway.

The Parish Council has no wish to raise any matters in relation to the Clarke's Farm issue and finds itself in general agreement with the conclusions reached in its regard; namely that it is not appropriate for development within the current Plan context.

We would however draw attention to the recently submitted planning application 13/18697/OUT for an additional 12 hectares of mixed residential development (potentially an additional 261 new dwellings) and ask the question as to whether this too should be dealt with in a similar manner to Clarke's Farm i.e. an Addition to the Planning Strategy Statement and be subject to its own detailed Sustainability Appraisal ... it being an additional proposed allocation of residential building land over and above that currently within the proposed Plan for Stafford Borough (Publication,pre-submission), for which public consultation recently concluded.

In addition, we note the comments made with regard to land to the west of the M6 motorway with which the Parish Council is also in broad agreement noting, in particular, the reference (Paragraph 3.5) of the "extensive rural open countryside beyond including the villages of Hyde Lea, Derrington and Creswell.

Finally, when this document first appeared, my Parish Council was going to make formal reference to the land south of Creswell Grove (immediately to the north-east of motorway junction 14) and comment upon its non-inclusion within the over Plan for Stafford Borough but events have moved on and the recent Outline Application by Strawson Holdings Ltd (12/17167/OUT) - which Creswell Parish Council fully supported - has now gained Approval and so the principle of the mixed-use development of this site has been approved / confirmed.

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? No, I do not wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	on behalf of Fradley Estates (Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	PSS15
Response Date	29/05/13 16:24
Consultation Point	1.1 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

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

This paper purports to "bring together and explain the analysis of the major development potential of land around Stafford and Stone in a concise statement". Clearly for reasons set out in these representations on behalf of Fradley Estates the strategy and therefore the appraisal fail to do so.

The document does not assess all reasonable alternatives for Stone in that it does not consider the alternative strategic development opportunity put forward by Fradley Estates Ltd.

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. 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 precise as possible.

See representation re PSS para 4.3

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If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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

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

The Local Planning Authority has refused to engage with Fradley Estates over its reasonably made reasonable alternative location for development at Stone. Consequently, the EIP represents a key opportunity to make the case.

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PSS16
Response Date	29/05/13 16:26
Consultation Point	3.3 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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

Creswell Parish Council is pleased to see the acknowledgment of the "rural open countryside beyond the M6 motorway including the villages of Hyde Lea, Derrington and Creswell.

It would further add that there are many issues caused to our community by the physical separation (from the Stafford urban area) by the presence of the motorway - most notably lack of safe and easy access to community facilities, health care centres and retail outlets.

The recently approved Strawson Holdings development may, eventually, go some way to ameliorate these disadvantages.

The community is served only by a sparse Public Transport (Bus) Service.

The overriding issue though is that developments beyond this point all necessitate traffic travelling along the A5013, through Creswell Grove ... a road wholly unsuited for the existing, high-volume traffic it currently endures - including a significant number of heavily laden HGVs !!

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? No, I do not wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	on behalf of Fradley Estates (Paul Sharpe Associates on behalf of Fradley Estates)
Comment ID	PSS17
Response Date	29/05/13 16:26
Consultation Point	4.3 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

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Do you consider that the document is Sound? No

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Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

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

Representations have been made on behalf of Fradley Estates Limited consistently throughout this Plan making process - these representations are not repeated here.

Fradley Estates Limited contend that the reasonable alternative proposals for strategic development at Stone has not been fully or properly assessed by the Council. A sustainable opportunity for development on the east side of Stone is ignored and, thereby, the Plan is not positively prepared; is not justified and is not effective or consistent with national policy.

In the final sentence of para 4.3 the Council claim that the eastern direction of growth for Stone is constrained by the West Coast mainline and that development would be located on prominent high landscape above the town. The evidence submitted on behalf of Fradley Estates Limited demonstrates that neither attribute applies to the Fradley Estates Limited land. However the Council refuse to

entertain meaningful discussions about the Fradley Estates Limited opportunity and have not challenged or disputed the technical evidence that has been submitted.

Instead the Council summarily dismisses the Fradley Estates Limited proposals as part of very early considerations of potential development of 1400 houses for the Aston Lodge Park area - proposals that were discounted. Consequently the Council has not fully and properly considered a reasonable alternative development location at Stone and in so doing the Plan is not prepared positively and is not consistent with NPPF policy. The representations on behalf of Fradley Estates Limited demonstrate that inclusion of the Fradley Estates Limited location would provide a more appropriate strategy for Stone and thereby the Addendum SA and Planning Strategy Statement are not "justified".

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. 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 precise as possible.

The two documents can be made sound by the inclusion of the sustainable urban extension proposals/alternative strategy development location East of Stone in the Plan as proposed by Fradley Estates Limited.

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

The Local Planning Authority has refused to engage with Fradley Estates over its reasonably made reasonable alternative location for development at Stone. Consequently, the EIP represents a key opportunity to make the case.

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Creswell Parish Council (Mrs Lisa Horritt)
Comment ID	PSS18
Response Date	29/05/13 16:43
Consultation Point	3.4 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.4

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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

Creswell Parish Council is concerned about the recent Planning Application for an additional 261 dwelling residential development, off Tixall Road, which is over and above the current Plan allocations. Blackheath Lane, Tixall Road and Baswich Lane will simply be unable to absorb such additional traffic as this extra development will create. Furthermore this will, inevitably, add further traffic flow along the A513 Beaconside - to the A34 North and to the M6 Motorway ... something that is already a matter of grave concern to this Parish Council. It is quite simply untenable to keep adding more and more traffic onto the A513 in the blinkered belief that (somehow) this road "will cope". Current peak hour queues (along huge stretches of this road, at both ends, is already proof that this quite simply is not nor cannot be the case !!! Finally: - 1: The Parish Council notes and concurs that "the route of the recent proposal for the High Speed 2 railway will now provide a future physical barrier to new development to the north and east of this Strategic Development Location." 2: Also noting - and strongly agreeing with the observation within paragraph 5.1 of the Revised Sustainability Appraisal Report that: -

"Beaconside Road could be a barrier to movement to the town centre itself." - not only along it, but any attempt to cross it ... and that includes from proposed new developments to the northeast of Beaconside and on the MOD site(s) adjacent to this already heavily congested road.

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? No, I do not wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Natural England (Hayley Pankhurst)
Comment ID	PSS19
Response Date	29/05/13 16:30
Consultation Point	Planning Strategy Statement (View)
Status	Processed
Submission Type	Email
Version	0.4

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England welcomes the production of the Planning Strategy Statement and Revised SA Report Addendum. We have considered the reports and do not consider that they pose any likely or significant risk to the natural environment for which we would otherwise provide a more detailed consultation response. We therefore have no specific comments to make.

Date: 29 May 2013
Our ref: 84419 & 84420
Your ref: None given



forwardplanning@staffordbc.gov.uk

BY EMAIL ONLY

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

T 0300 060 3900

Dear Sir/Madam,

The Plan for Stafford Borough – Planning Strategy Statement and Revised Sustainability Appraisal Report Addendum

Thank you for your email regarding the above, dated 19 April 2013 and received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the production of the Planning Strategy Statement and Revised SA Report Addendum. We have considered the reports and do not consider that they pose any likely or significant risk to the natural environment for which we would otherwise provide a more detailed consultation response. We therefore have no specific comments to make.

For any queries relating to the specific advice in this letter only please contact Hayley Pankhurst on 0300 060 1594 or by email to hayley.pankhurst@naturalengland.org.uk.

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

Yours faithfully,

Hayley Pankhurst

Lead Adviser
Land Use Operations

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Lufton & Assoc's for Clarke Farms ()
Comment ID	PSS20
Response Date	30/05/13 23:08
Consultation Point	3.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.2

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified

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

Land at Beacon Farm provides an excellent opportunity for the long-term expansion of Stafford town that could be developed in accordance with the policies and strategy of the National Planning Policy Framework (NPPF) and the Stafford Borough Submission Core Strategy. **Plan 1: Beacon Farm: Site and Surrounds**

The area suggested for potential development (**see Plan 2 below**) relates very well to the existing urban form with minimal encroachment into open countryside and fitting into a natural landscape and topographical crescent under higher land to the north and north-east of the town. There are a number of defensible boundaries that can be used to provide a clear definition to the urban extent of the town and the proposed alignment of the HS2 line encloses an obvious urban extension and outward long-term distant defensible boundary.

The allocation of land at Beacon Farm would also provide an excellent opportunity to screen and mitigate the impact of HS2 that can be incorporated into the development form and landscaping strategy.

Furthermore and most significantly the allocation of land at Beacon Farm provides a logical opportunity to integrate with the long-term plans of the MoD on adjoining land at Beacon Barracks. It is clear that the MoD may require additional land to meet the demand to provide additional housing for military personnel as well as having some flexibility to expand and reconfigure Beacon Barracks for the operational needs of a modern and adaptable military presence in the town. Recent ministerial announcements indicate that the whole of the British Army will be repatriated from Germany in a relatively short timeframe to 2020 and that Stafford has been favoured as a returning military base.

No significant constraints; planning, environmental, technical or otherwise have been identified that would either limit the scope of development or prevent it absolutely. These are considered further below.

The most significant technical constraint at present is providing an adequate vehicular access to the site and working with the uncertainties of military planning and the adjoining land ownership of the Ministry of Defence. The access issue is considered to be a matter that can be resolved in the 'medium' timeframe of 5-10 years and certainly within the time horizon of the current Core Strategy. There are a number of potential options for accessing the site and improving the accessibility, links between land-uses and increasing opportunities for walking and cycling in the north-east of the town. This is considered and documented in this report.

The allocation of Beacon Farm is proposed as providing for the development of around 1,000 new dwellings in two distinct phases and over a period of around 10-15 years. The first phase would be anticipated to provide 500 dwellings between 2020 and 2026. Opportunities arise to provide a local centre for the development and a primary school as well as extensive areas of public open space, formal areas for sport, areas of ecological enhancement, habitat creation and a public park.

Plan 2: Beacon Farm: Indicative Masterplan

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If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Lufton & Assoc's for Clarke Farms ()
Comment ID	PSS21
Response Date	31/05/13 10:42
Consultation Point	3.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.4
Files	North-East Stafford Beacon Farm Weston Road - The Planning Case

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified

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

See attached report.

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. 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 precise as possible.

See attached report.

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In order to comply with data protection you are advised **not to sign** any letter or document as it will publicly available.

If you would like to submit any additional supporting information please upload files below. [21052013 Beacon Farm - The Planning Case\\${5643497466010451233}.doc](#)

Report on the Planning, Sustainability and Accessibility Case for the Allocation of Beacon Farm, north-east Stafford as a Strategic Development Location for Housing

Lufton & Associates, Chartered Planning Consultancy, Stafford on behalf of Clarkes Farms

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Site Opportunities and Constraints

Land at Beacon Farm provides an excellent opportunity for the long-term expansion of Stafford town that could be developed in accordance with the policies and strategy of the National Planning Policy Framework (NPPF) and the Stafford Borough Submission Core Strategy.

Plan 1: Beacon Farm: Site and Surrounds



The area suggested for potential development (**see Plan 2 below**) relates very well to the existing urban form with minimal encroachment into open countryside and fitting into a natural landscape and topographical crescent under higher land to the north and north-east of the town. There are a number of defensible boundaries that can be used to provide a clear definition to the urban extent of the town and the proposed alignment of the HS2 line encloses an obvious urban extension and outward long-term distant defensible boundary.

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Furthermore and most significantly the allocation of land at Beacon Farm provides a logical opportunity to integrate with the long-term plans of the MoD on adjoining land at Beacon Barracks. It is clear that the MoD may require additional land to meet the demand to provide additional housing for military personnel as well as having some flexibility to expand and reconfigure Beacon Barracks for the operational needs of a modern and adaptable military presence in the town. Recent ministerial announcements indicate that the whole of the British Army will be repatriated from

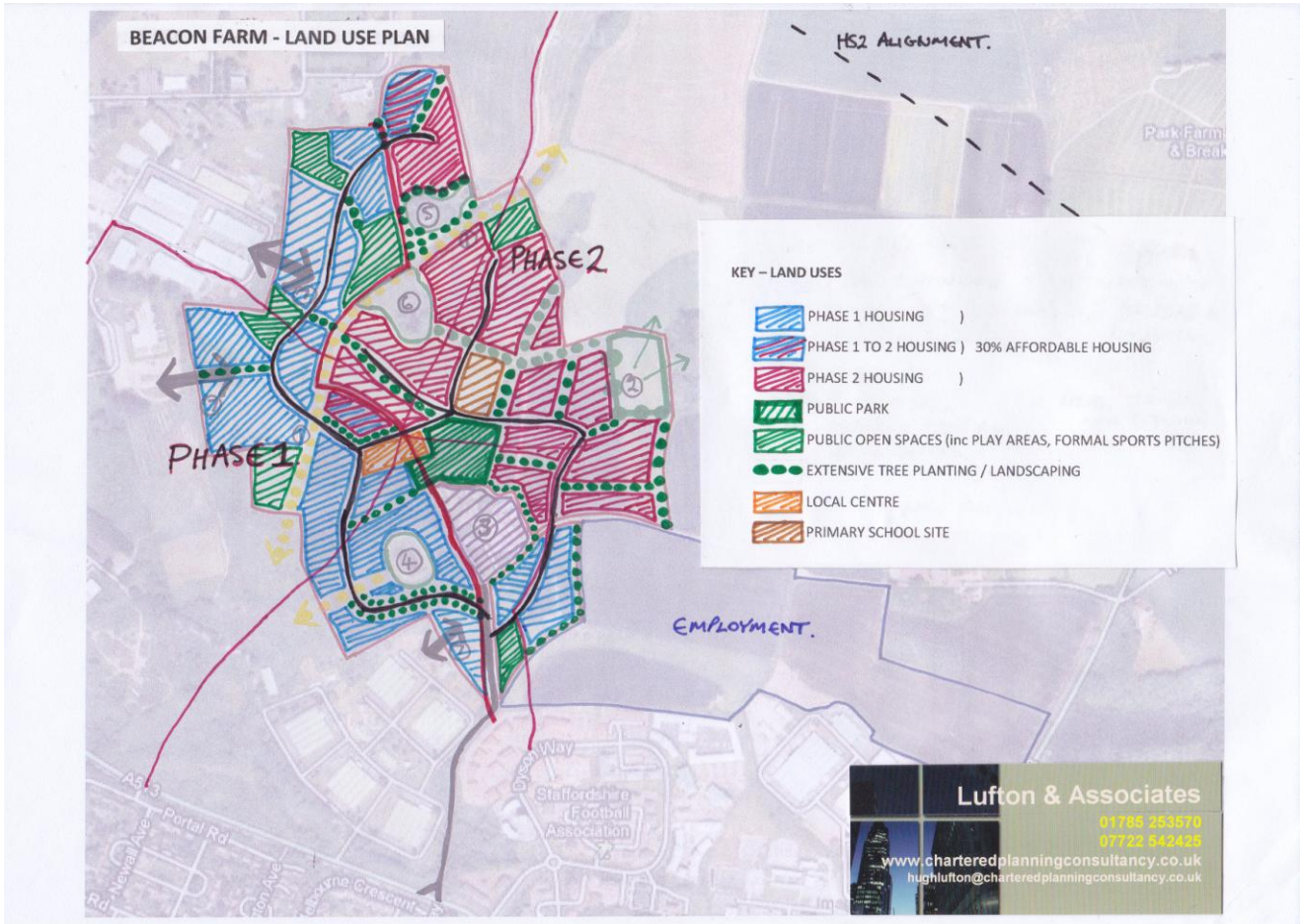
Germany in a relatively short timeframe to 2020 and that Stafford has been favoured as a returning military base.

No significant constraints; planning, environmental, technical or otherwise have been identified that would either limit the scope of development or prevent it absolutely. These are considered further below.

The most significant technical constraint at present is providing an adequate vehicular access to the site and working with the uncertainties of military planning and the adjoining land ownership of the Ministry of Defence. The access issue is considered to be a matter that can be resolved in the 'medium' timeframe of 5-10 years and certainly within the time horizon of the current Core Strategy. There are a number of potential options for accessing the site and improving the accessibility, links between land-uses and increasing opportunities for walking and cycling in the north-east of the town. This is considered and documented in this report.

The allocation of Beacon Farm is proposed as providing for the development of around 1,000 new dwellings in two distinct phases and over a period of around 10-15 years. The first phase would be anticipated to provide 500 dwellings between 2020 and 2026. Opportunities arise to provide a local centre for the development and a primary school as well as extensive areas of public open space, formal areas for sport, areas of ecological enhancement, habitat creation and a public park.

Plan 2: Beacon Farm: Indicative Masterplan



Assessment of Development Constraints

Flooding and Waste Water Management

There is no record of any significant flooding on land north-east of Stafford and there are no significant watercourses, aquifers or water reserves that would prevent development (*see Plans 3 and 4*).

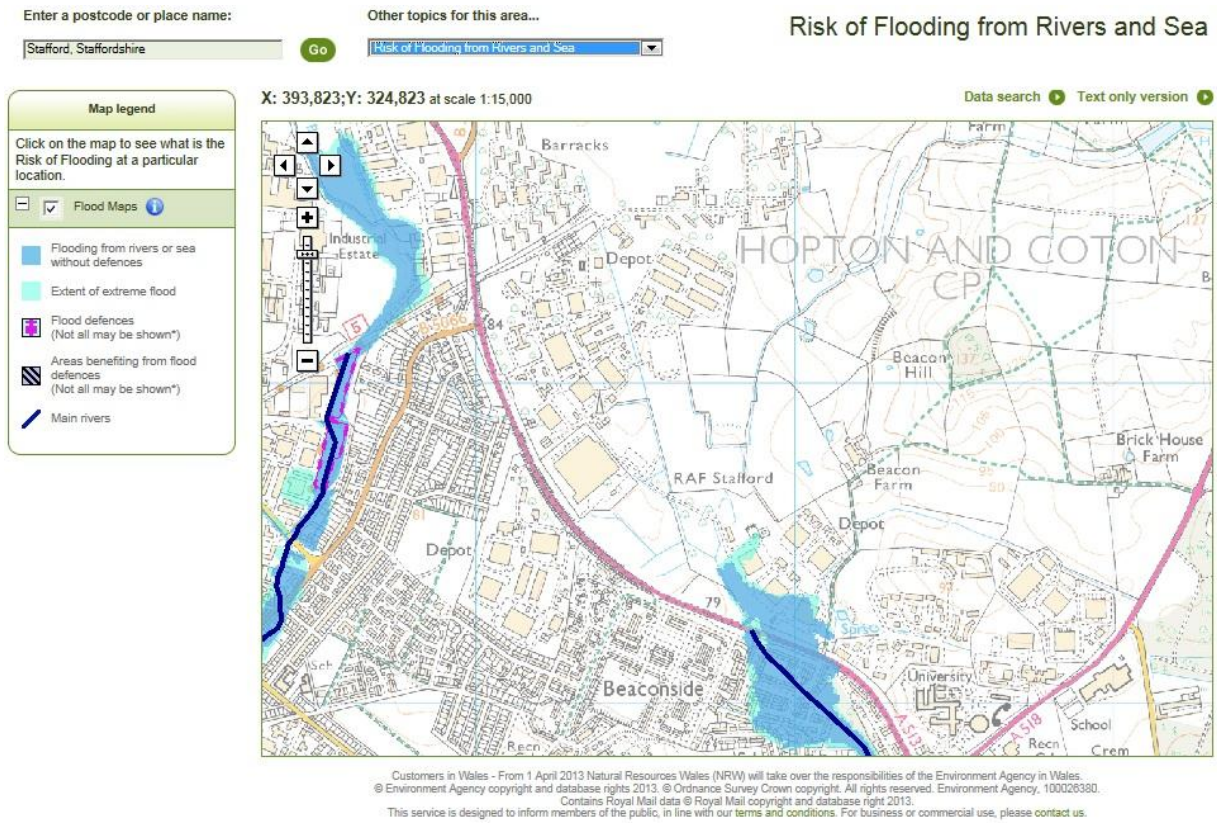
The landowners and any development partner would co-operate to provide and meet high environmental standards for water recycling, on-site water treatment and the implementation of sustainable drainage techniques.

It is not anticipated that any development of Beacon Farm would complicate or impinge on the wider sewage, waste water or drainage network.

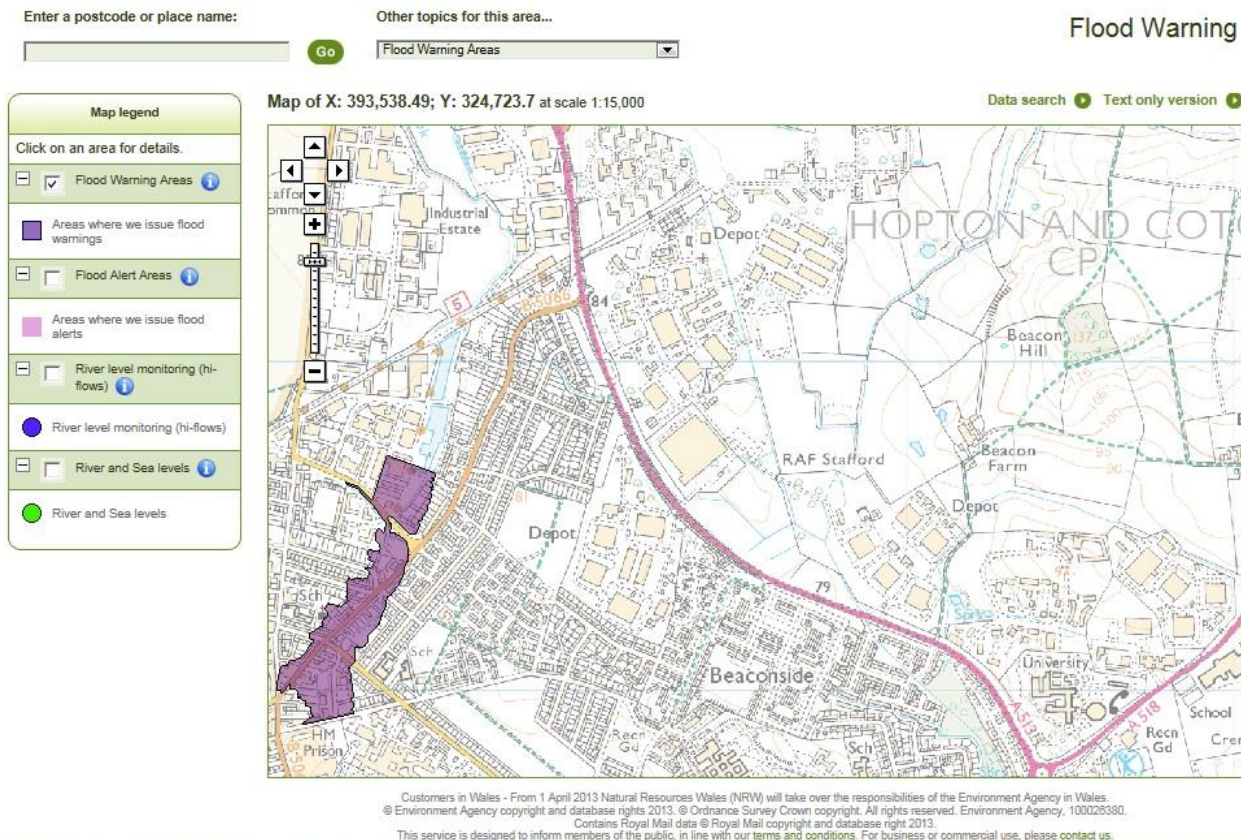
As indicated through the indicative Ecological Framework Plan (*Plan 15*) it is anticipated that areas of woodland, wetland or other valuable habitats can be created as part of the development. These would be planned in accordance with professional advice of the appropriate environmental and planning authorities. The ecological framework proposals afford an opportunity for the area to be a net store of surface water and offer flood alleviation and mitigation to a wider area and not increased run-

off as suggested by the revised SA report addendum.

Plan 3: Beacon Farm: Risk of Flooding



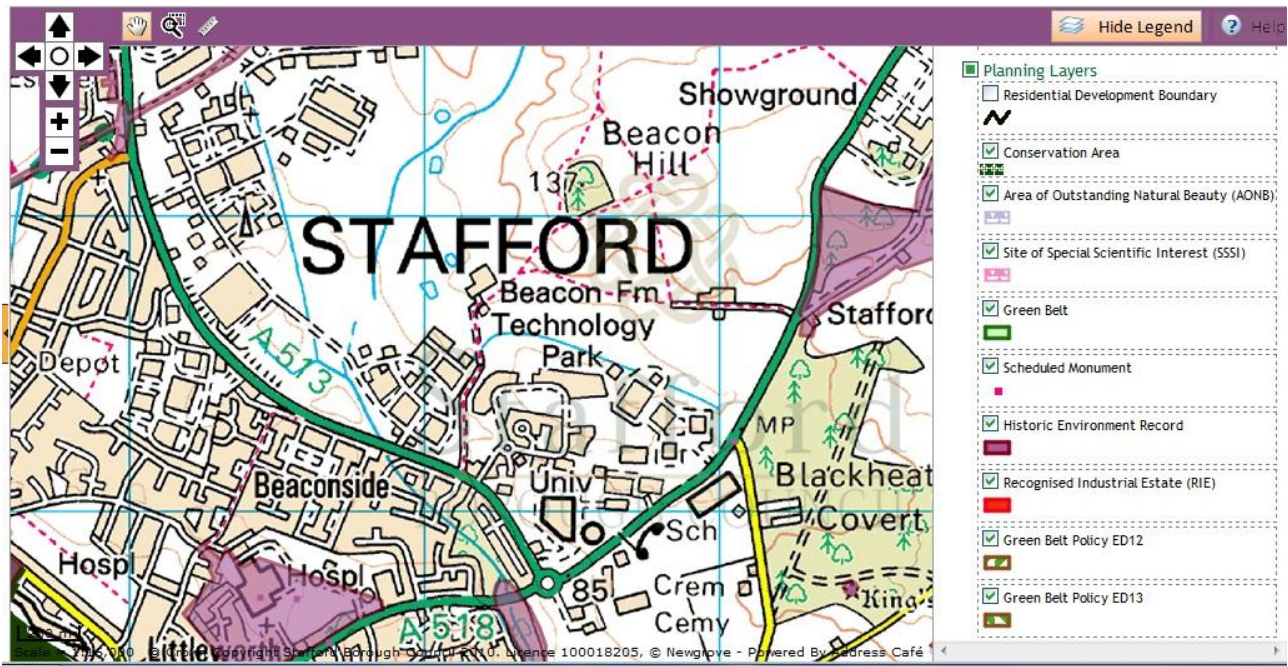
Plan 4: Beacon Farm: Areas of Notified Flood Warnings



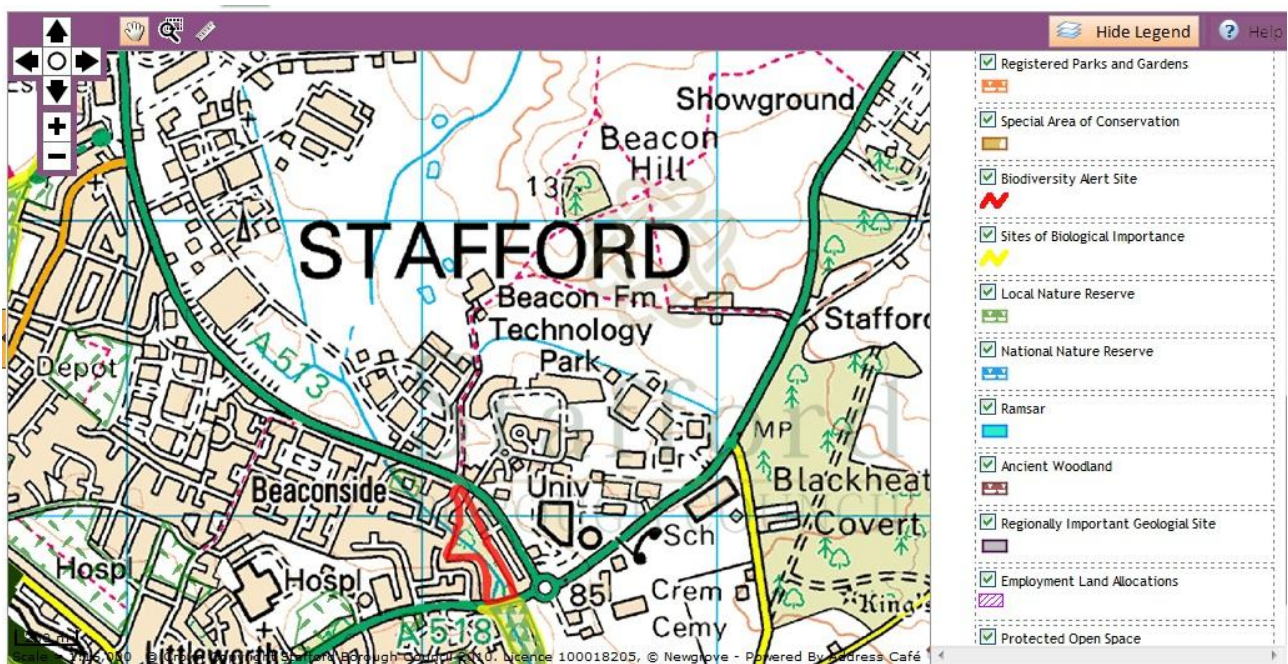
Ecology, Biodiversity and Habitats

Plan extracts 5 and 6 are reproduced from the Stafford Borough Local Plan Proposals Map 2001 and Plan 7 is an extract is reproduced from the current (2013) Defra Magic Geographic Information System.

Plan 5: Beacon Farm: Extract of Stafford Local Plan 2001(1)



Plan 6: Beacon Farm: Extract of Stafford Local Plan 2001(2)



The area at Beacon Farm proposed for development is covered by no significant environmental designations in relation to ecology, biodiversity or habitats. The proposed development area contains no sites of special scientific interest (SSSI's), no designation as a special area of conservation (SAC), no RAMSAR designation (for bird habitat) or any designation national, regional or local as a nature reserve.

As Plan 7 shows the only land-based designation of the area is for nitrate vulnerability that is an issue that impacts on the whole of Stafford Borough.

The woodland at Beacon Hill, adjacent to the proposed development area, is recognised

and included in the Inventory of Woodland and Trees administered by English Nature and recorded as deciduous biodiversity action plan priority habitat (**see Plan 8**). As indicated through the indicative Ecological Framework Plan (**Plan 7**) it is anticipated that the development of Beacon Farm would provide enhancement to the established woodland with adjoining complementary planting and/or wetland and habitat creation.

Land adjoining Beacon Farm within the wire of Beacon Barracks also contains some deciduous biodiversity action plan priority habitat (**see Plan 8**) and the landowners, Lufton & Associates as agents and any development partner would co-operate with the MoD in any potential joint development project to assist them in the protection of this asset.

In terms of grassland and lowland habitats the proposed development area contains no priority areas (**See Plan 9**).

The proposed development area is not recognised as an area important for birds (**See Plan 10**).

The landowner is aware of some presence and activity of badgers befitting from the rich habitat provided by the established hedgerows on Beacon Farm. In accordance with protection legislation these areas cannot of course be identified in a public document. These habitats would be fully protected in accordance with the indicative Ecological Framework Plan (**Plan 15**) recognising that badgers while a protected species under their own 1992 Act are also currently subject of a legal extermination programme to control bovine tuberculosis.

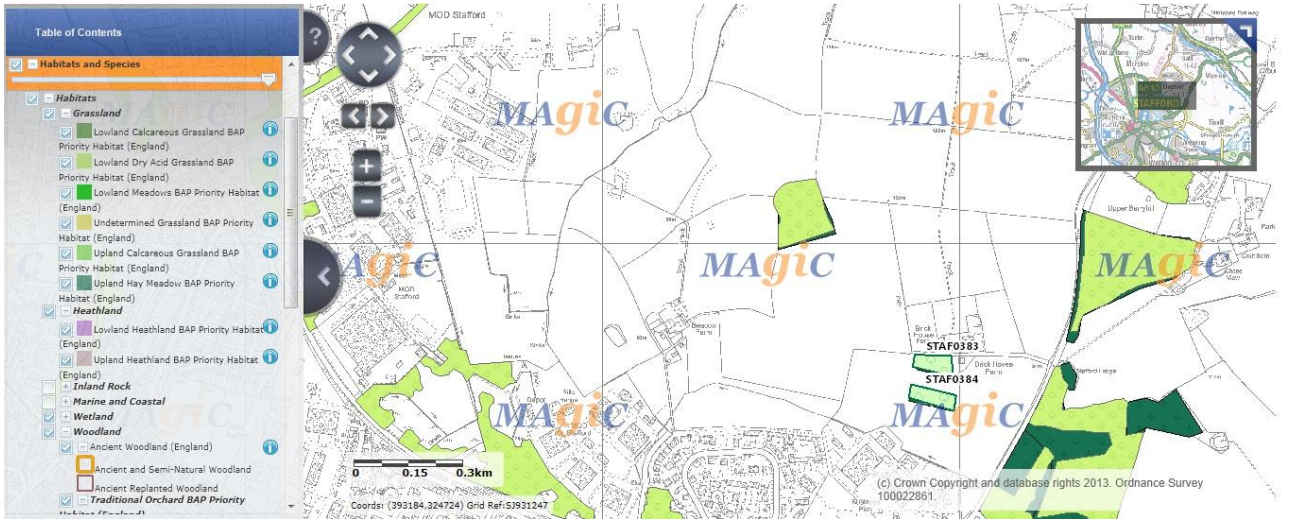
Plan 7: Beacon Farm: Extract of Defra Magic: Land Based Habitat Designations



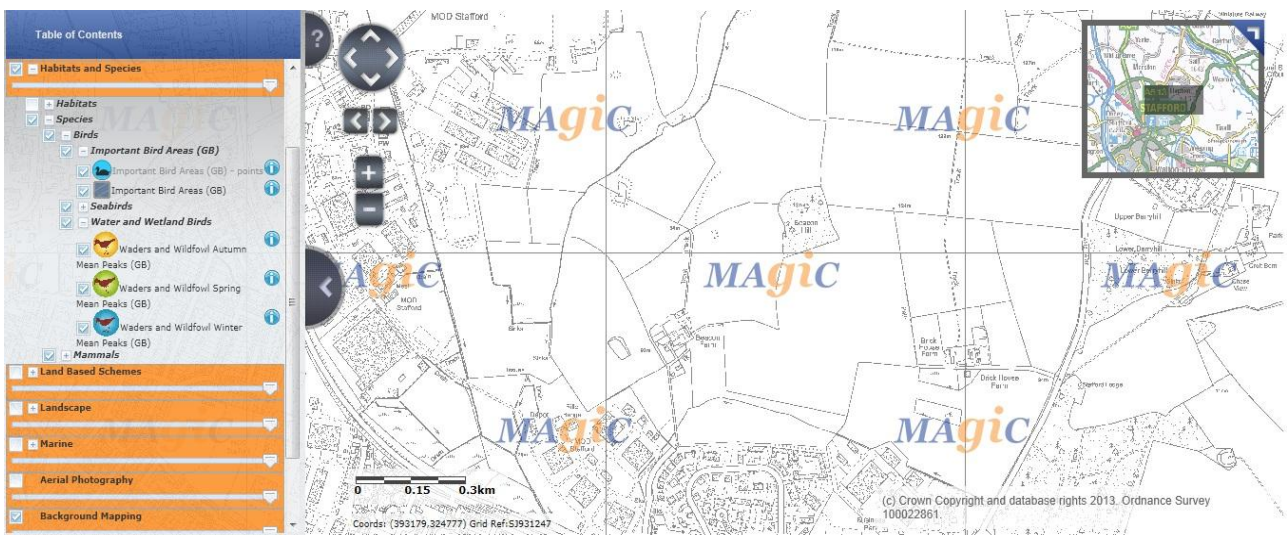
Plan 8: Beacon Farm: Extract of Defra Magic: Woodland Habitats



Plan 9: Beacon Farm: Extract of Defra Magic: Grassland Habitats



Plan 10: Beacon Farm: Extract of Defra Magic: Areas of Protection for Birds

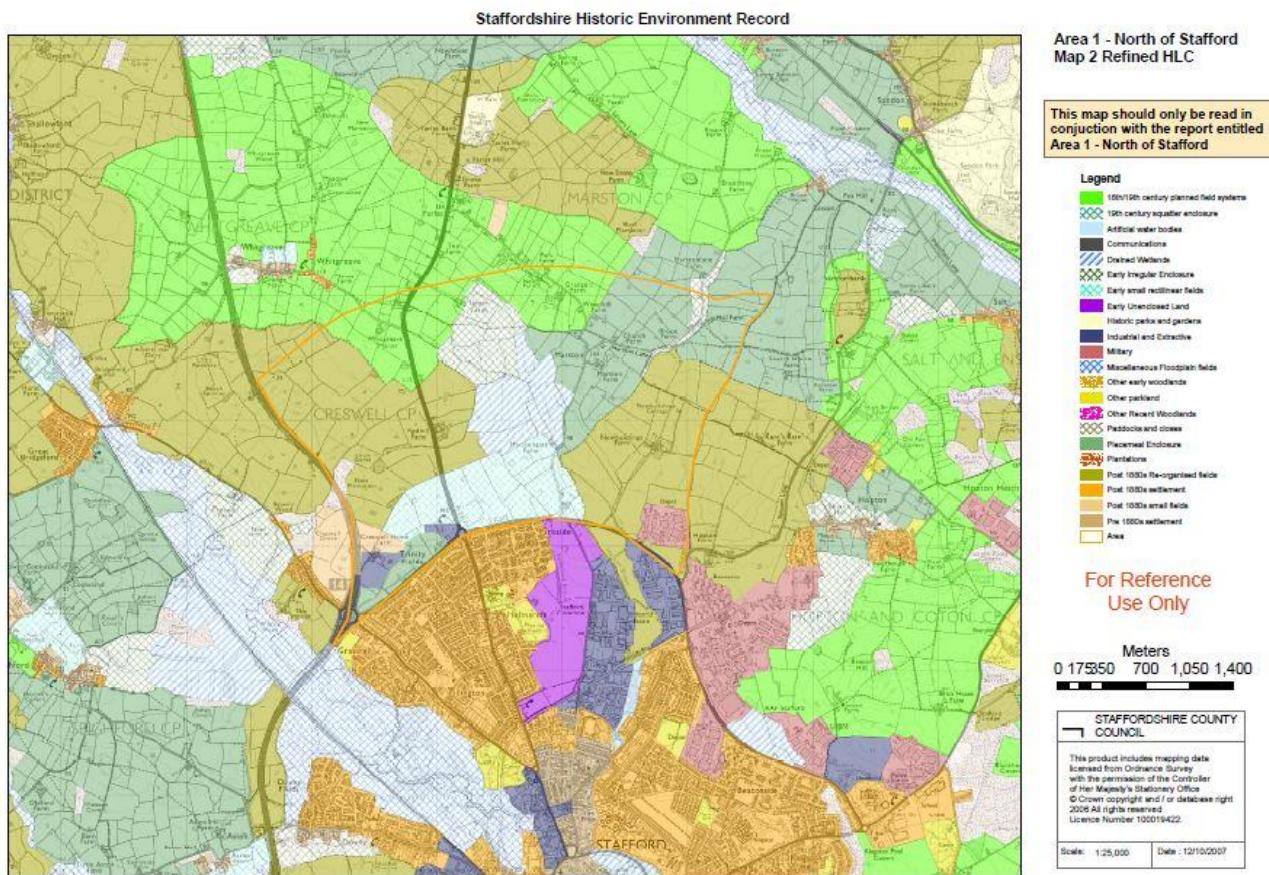


Landscape Impact and Topographical Setting

In terms of an objective assessment of landscape quality the area proposed for development is not identified by the Staffordshire and Stoke-on-Trent Planning for Landscape Change Supplementary Planning Guidance (SPG) 2001 as an area of high sensitivity. The policy objectives of the extant guidance for the area divide Beacon Farm into two parts to the west as landscape enhancement and to the east as landscape maintenance.

More recent analytical work on the historic landscape character (*see Plan 11*) undertaken by Staffordshire County Council and English Heritage indicates that Beacon Farm exhibits character of 18th and 19th century planned field systems and 19th century squatter enclosure. Both landscape characters being unremarkable in the local context.

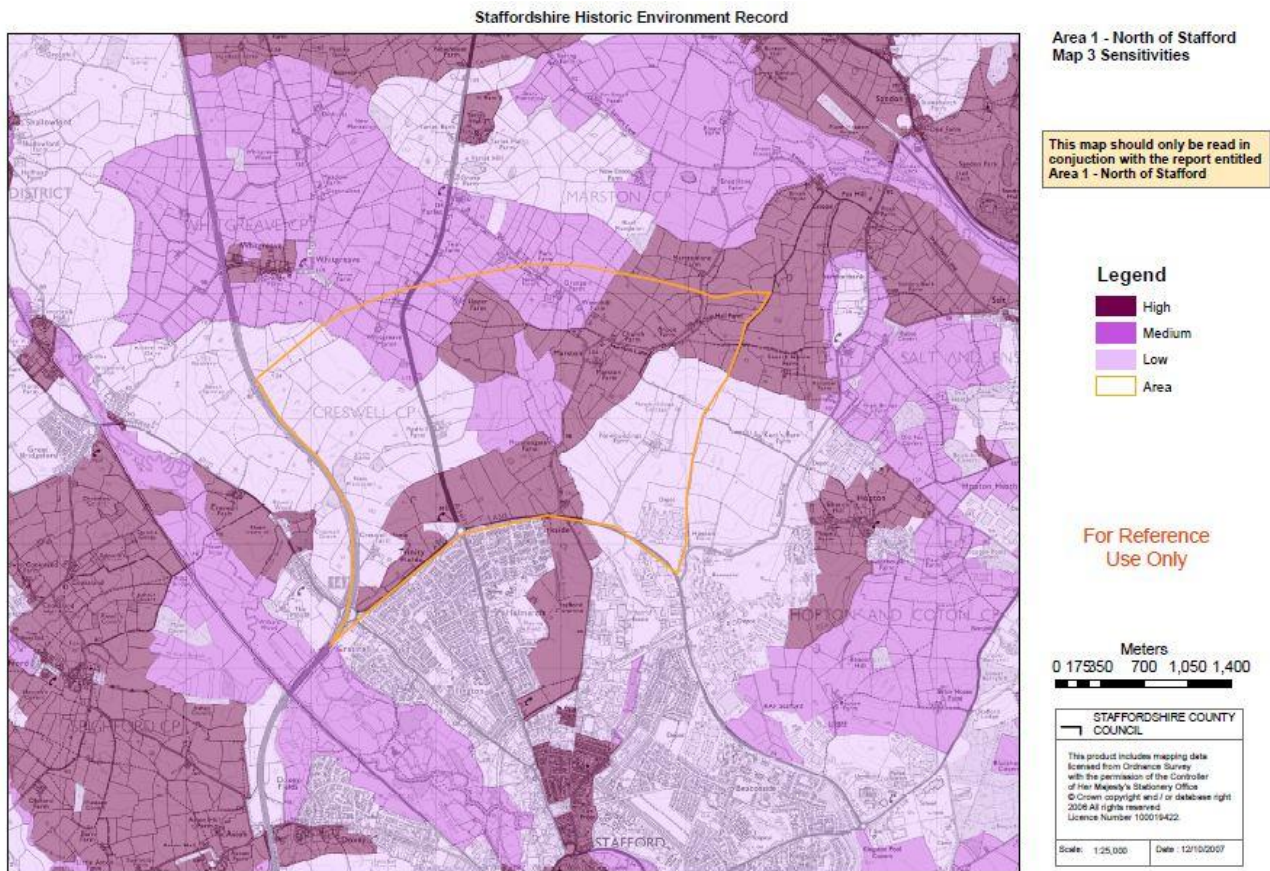
Plan 11: Beacon Farm: Extract from Historical Land Characterisation for North of Stafford



In terms of the sensitivity of the historical landscape character to accommodate change the County Council have assessed the majority of the proposed development area as medium with a small area south-west of Hopton village as high (*see Plan 12*).

None of the higher ground to the north-east of the town is proposed for development. The proposed development area is all lower-lying land under Beacon Hill and a natural ridge line to the north. The landowner and agent working with a future development partner intend to provide a visual impact assessment to support the proposal in due course.

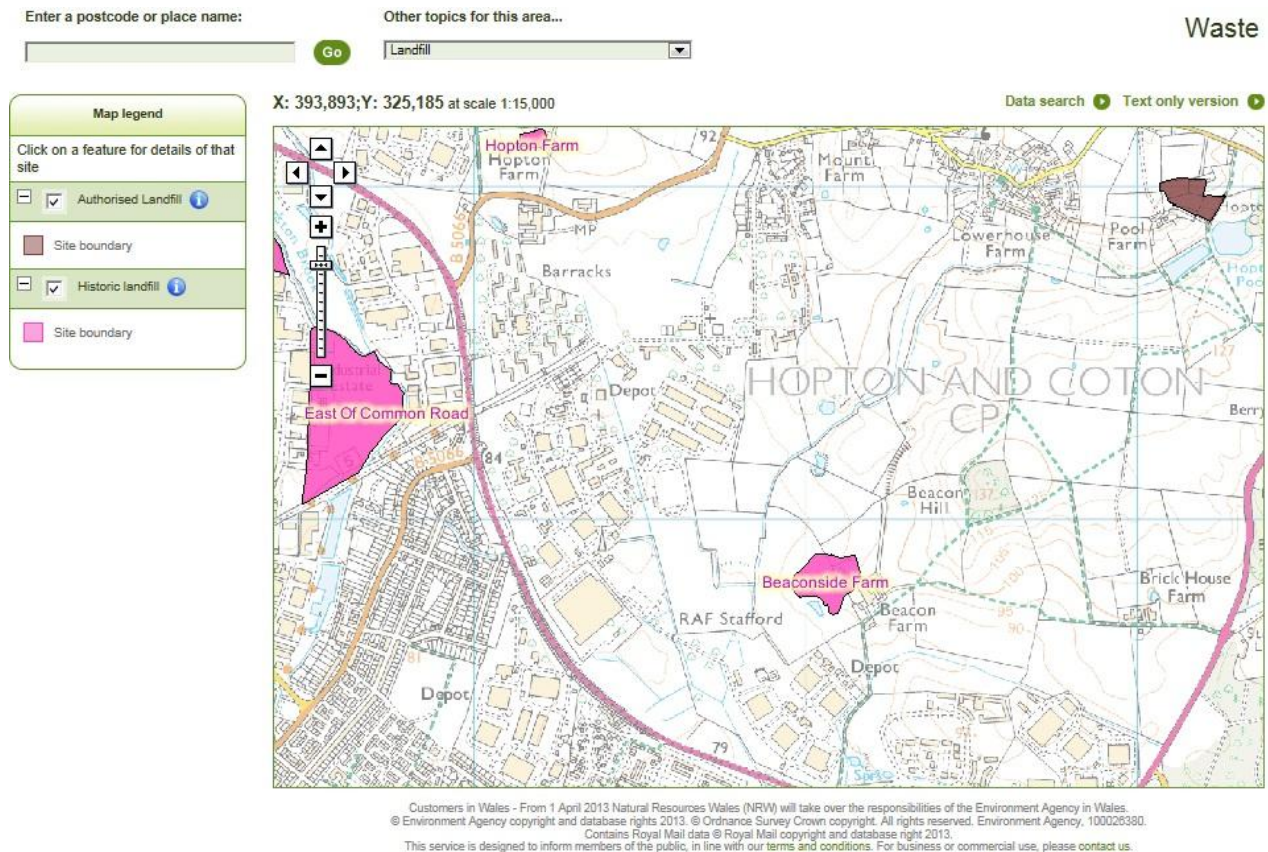
Plan 12: Beacon Farm: Extract from Historical Land Characterisation Sensitivity for North of Stafford



Landfill and Ground Contamination

Land directly to the west of Beacon Farm farmstead has historically been landfilled (**see Plan 13**). Planning records available to Lufton & Associates indicate this is likely to be non-hazardous inert building and commercial waste that would have no impact on the viability of the proposed area for development.

Plan 13: Beacon Farm: Environment Agency Record of Landfill



Mineral Sterilisation

Research and assessment undertaken by the British Geological Survey (2006) to assist Staffordshire County Council in identifying Mineral Consultation Areas appears to indicate that if there are any workable mineral resource lying beneath the proposed development area that this would be bedrock sand or near surface superficial sand and gravel.

These minerals in reserve and currently being worked are abundant in the local, Staffordshire and national context with significant extant permitted reserves. It is not anticipated the presence of any mineral resource would be a significant constraint to the development of Beacon Farm.

Utilities and Services

The work commissioned by the Borough Council to inform infrastructure planning from the consultants Colin Buchanan (Buchanan, LEVVEL, Hewden and Mott McDonald, July 2009) covers the issues of gas, electricity and water supply at a macro town wide scale.

In relation to gas supply the report states;

"Gas supply is generally based on three networks:

the high pressure system which transports gas over large distances

□ *the medium pressure system which provides gas to specific locations and Settlements.*

□ *the low pressure system which distributes gas at a local level.*

Stafford has a medium pressure ring main which runs around the majority of the town supplying gas to off take stations feeding small low pressure minor networks which service individual properties.

From our discussions with Fulcrum Infrastructure Services none of the locations considered for this study are known to have any requirement for works to the high pressure system. The ring main around Stafford is a medium pressure system, which would be extended to service sites such as SF-h on the northern edge of Stafford without the requirement any works to the high pressure system.

In general, there are no major gas infrastructure works required in Stafford. The gas supply network appears to be robust and has the potential capacity to accommodate all of the proposed developments. As a result, the majority of the proposed sites only require 'standard' connections into the medium pressure system. The costs of these connections would appear as a standard cost for developers."

In relation to electricity supply the report states;

"For any significant development it is likely that a new local substation will be required to service specific locations. The majority of the developments proposed in Stafford town are on the outskirts of the existing urban development and as a result of this and their proposed scale it is likely that they will all require a new local substation. The cost of this (estimated at around £70,000 each) would be expected to be borne by the developer/landowner. Costs of additional infrastructure required to support a development may also require a contribution from the developer.

In order to deliver the proposed scale of housing developments, 11kv network improvements would be required for all of the proposed sites. Across the whole of Stafford, if all of the proposed developments were to come forward these infrastructure improvements would cost in the region of £12 million.

In addition to the 11kv network improvements, if proposed site SF-2 (3,000 units) is developed, a new major substation connected to the 132kv supply network would be required. This could also serve SF-1 (800 units). This infrastructure improvement would have a longer lead time than the local improvements and would cost in the region of £6 million."

In relation to water supply the report states;

"Clean water can be supplied from a number of sources and in Stafford Borough these include boreholes and reservoirs (to the north, south-east, and south-west of Stafford town) as well as a number of groundwater sources. Two out of the three reservoirs (south-east and south-west) are at capacity. However, the network layout does not currently allow optimum use of the capacity available at the northern reservoir at Peasley Bank.

The northern direction of growth could be supported without any further infrastructure improvements. However, the network has been identified as needing re-inforcement in

order to meet the western growth requirements. Further re-inforcements will be needed if growth in the south and east is to be supported.

Severn Trent Water will not fully fund the provision of infrastructure to support development although an allowance for this infrastructure is included within their business plan. A contribution to the cost of infrastructure from a developer is calculated as a 'commuted sum' which is based on the cost of the infrastructure minus the potential income which the new connections will generate for Severn Trent over a 12 year period.

In general lead times for reinforcement works to the network are in the region of 18 months with a construction period of around 12 months."

The report considers only the Strategic Development Locations favoured by the Borough Council although the report findings are as relevant to the proposed allocation of Beacon Farm.

Ministry of Defence (MoD), the Defence Infrastructure Organisation (DIO) and the Military Facility North-East of Stafford

The MoD land-holdings surround the proposed development area to the north-west, west and south-west. Lufton & Associates have engaged with the DIO since January 2013 being aware that there are significant and far-reaching changes in military organisation planned that could have considerable implications for the MoD presence in the town.

The BORONA programme that involves implementing the closure of Rhine Garrison, Munster Station and Celle Station in Germany and returning military personnel to the UK is well documented. It is understood that this programme is to cover a rapid and vital part of military restructuring and will involve the accommodation of the major units of the 1st Signal Regiment (from Herford) and the 16th Signal Regiment (from Elmpt) in Stafford by 2015. These will join the 22nd Signal Regiment already based in the town.

In March this year the Defence Secretary, Phillip Hammond, made a very clear statement to the House of Commons that all military bases in Germany are to close by 2020. The majority of personnel are programmed to return to the UK by 2016 with the 20th Brigade comprised of over 4,400 troops to be the last presence in Germany being recalled by 2020.

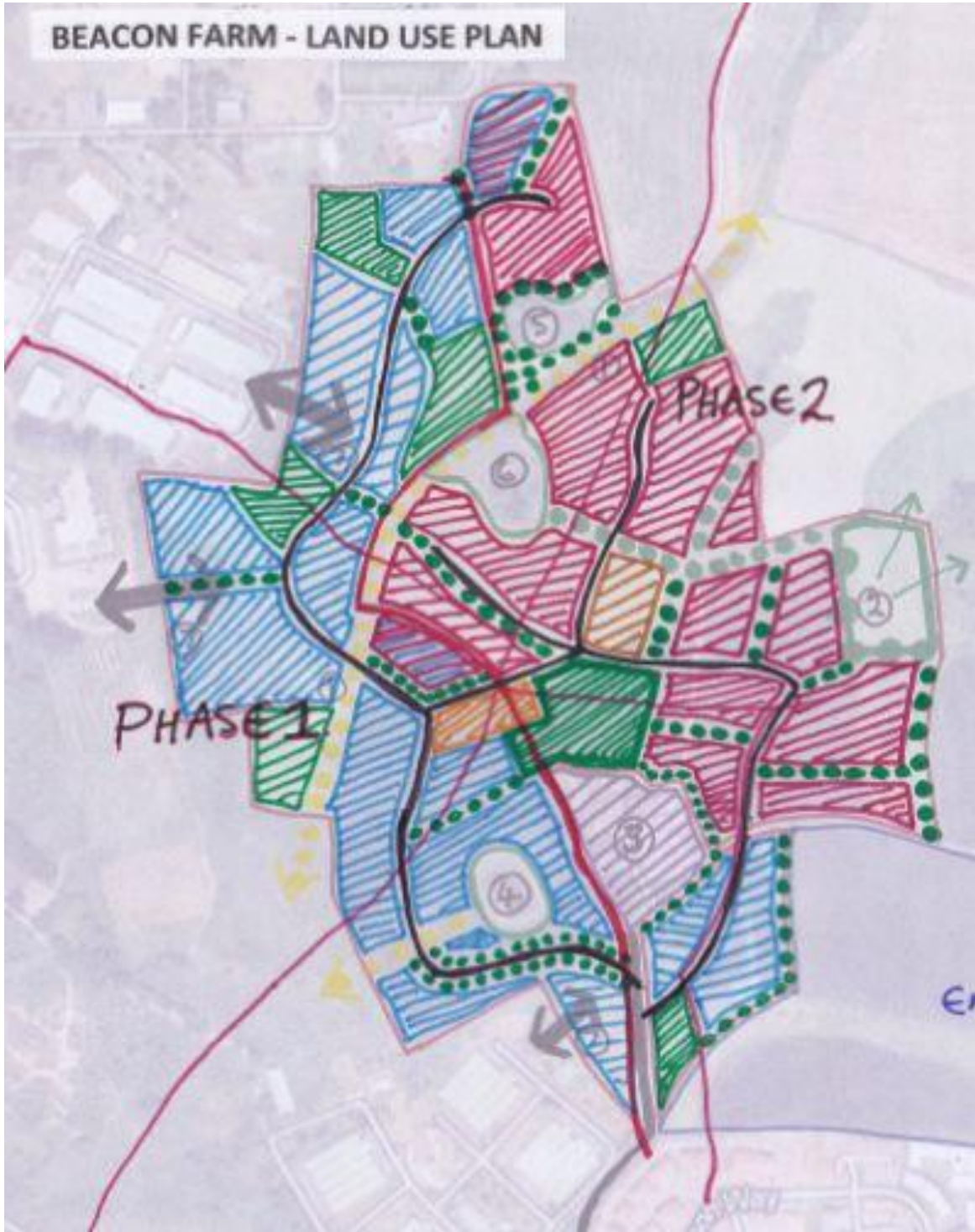
Seven MoD bases including Stafford are mentioned generally as recipient sites. This is part of a significant cost-saving programme in Germany and a £1.8billion investment plan in infrastructure and accommodation by the MoD in the UK and is additional to the BORONA programme with a 2015 timeline.

The landowners and Lufton & Associates are willing to work with the DIO and consider any proposals that would be of mutual benefit. What seems important is that despite issues of operational and site security at Beacon Barracks the DIO actively engages with the relevant parties and authorities to plan the future presence of the MoD in the town. Lufton & Associates considers this should be within rather than outwith the Core Strategy process.

Delivery: Gestation of a Masterplan

The landowners and agents Lufton & Associates consider in the view of the Core Strategy process and the detail that the document contains an initial indicative Masterplan for the proposed development area would be helpful. This is shown at a wider scale on page 2, Plan 2 and below (**Plan 14**) focused on the development area.

Plan 14: Beacon Farm: Development Area - Indicative Land-Use Masterplan



The Land-Use Masterplan is born from a series of incremental and iterative planning

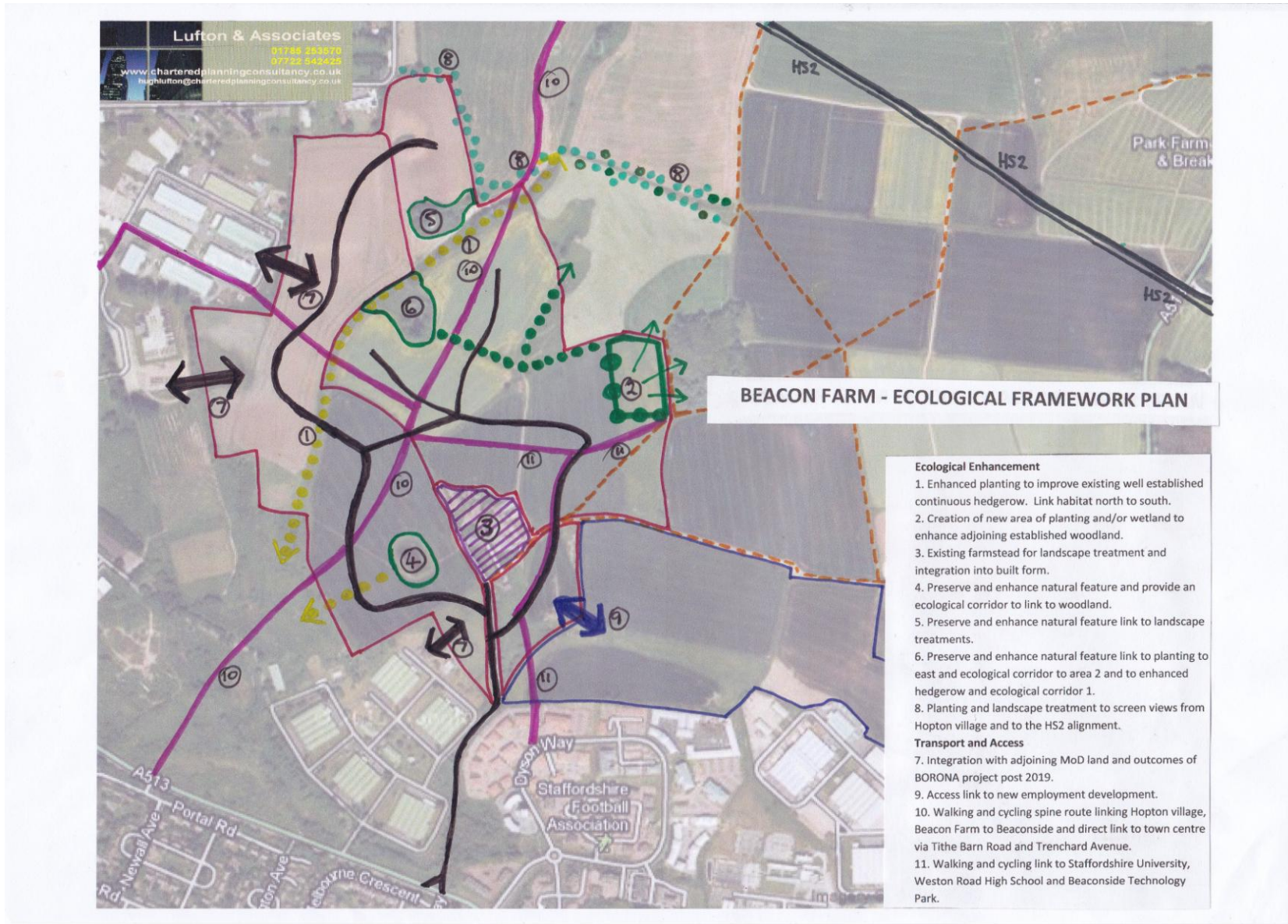
and design stages. It reflects the constraints and site opportunities considered above.

In particular the wider regeneration and planned changes within the Borough have been considered, as have transport initiatives and investment, the landscape setting and the topography of the location, the proximity of local communities and their sensitivity to change and pressures on supporting infrastructure.

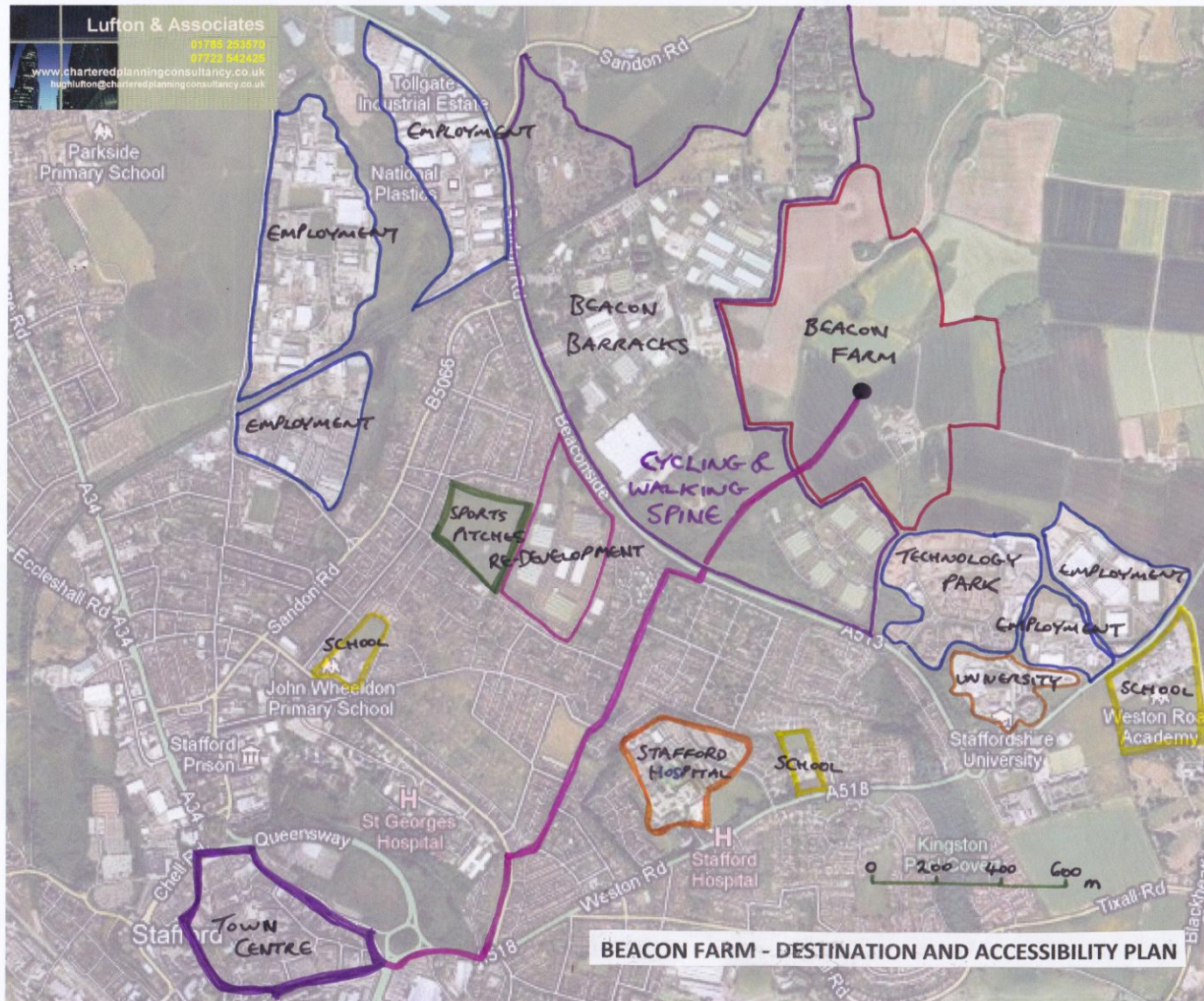
The indicative Masterplan seeks to integrate development with ecological improvements and enhancement and create a mix of land-uses with the objective of reducing the need for travel and minimising the generation of vehicular trips. A public park, local centre, a primary school and extensive areas of public open space are integral and central to the design philosophy.

The Destination and Accessibility Plan (**see Plan 16**), the Ecological Framework Plan (**see Plan 15**) and the Access, Transport and Integration Plan (**see Plan 17**) were prepared in advance and informed the Land Use Masterplan.

Plan 15: Beacon Farm: Ecological Framework Plan



Plan 16: Beacon Farm: Destination and Accessibility Plan



Plan 17: Beacon Farm: Access, Transport and Integration Plan



Principles of Accessibility

Plan 15 graphically represents an initial appraisal of the proposed development area in terms of accessibility to key locations, services and facilities and adjoining areas.

This is an assessment that the landowner and agent working with a future development partner intend to investigate further to support the proposal in due course.

The town centre is less than 2.5km from the centre of the proposed development area when connected using a route across Beacon Barracks via Trenchard Avenue, Tithe Barn Road and Corporation Street. It would of course require a controlled crossing or refuge on Beaconside to complete a viable route. A cycling and walking spine here though would draw together a number of high intensity land-uses including Stafford Hospital, the Beaconside south housing site and the major redevelopment of St. Georges Hospital. On the Access, Transport and Integration Plan (**Plan 16**) the cycling and walking spine is shown as connecting right through Beacon Farm to Hopton and could act as a sustainable transport route integrating the whole north-east quadrant of the town. As shown this would have very significant benefits in improving accessibility by a short branch connection to link to the Staffordshire University campus and the Technology Park.

A short branch cycle and walking route to Dyson Way (**Plan 16**) would also connect the proposed development area and central cycling and walking spine through the Technology Park and University Campus to Weston Road (Academy) High School.

Vehicular Access

Providing adequate access to the proposed development area is acknowledged at present to be the most significant technical constraint.

As indicated on Plan 16 the main access is proposed from Beaconside following the line of the existing track between the Technology Park and Beacon Barracks. This access is not in control of the landowner and will require negotiation to accomplish required highway and junction standards once developer backing has been secured. There appears to be no technical, physical or other impediment to access, the constraint issue it is purely a matter of land ownership and control.

The visibility, the controlled traffic speed, existing junction arrangements and the road safety record of Beaconside all appear favourable to securing an adequate junction arrangement in this location.

An alternative access could be made if there was a more significant redevelopment of Beacon Barracks although it is respected at present this would not be possible for reasons of operational security on the site. Alternative vehicular access might also be made from Weston Road, although clearly in terms of proximity to the urban area, this is not the favoured approach.

The landowner and agent working with a future development partner intend to work on access solutions as a matter of priority to support the proposal through the planning process.

Public Transport Access

Public transport access and service enhancement are a priority and a circulation route for buses is shown on Plan 16. The proposed development would offer opportunities to improve public transport services for north-east Stafford increasing connectivity with the town centre and providing better links for the Technology Park and the University.

Principles of Integration

The indicative Masterplan, Plan 2, and the Access, Transport and Integration Plan, Plan 16, indicate the importance recognised in integrating the proposed development area with the surrounding urban form, activities and communities. Particular attention in detailed design and planning would be given to integrating the proposed housing with the Technology Park extension and with any redevelopment or programmes of the MoD.

In relation to the adjoining MoD detailed design and planning could accommodate the relationship of the land-uses in any number of ways from integration to clear delineation, division and security. It is clear that there is likely to be a future accommodation need for family housing for military personnel whether through provision of market housing or some other form. This development could integrate very well with the new community proposals at Beacon Farm

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Lufton & Assoc's for Clarke Farms ()
Comment ID	PSS22
Response Date	31/05/13 11:02
Consultation Point	3.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.3

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified

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

Land at Beacon Farm provides an excellent opportunity for the long-term expansion of Stafford town that could be developed in accordance with the policies and strategy of the National Planning Policy Framework (NPPF) and the Stafford Borough Submission Core Strategy. Assessment of Development Constraints

Flooding and Waste Water Management

There is no record of any significant flooding on land north-east of Stafford and there are no significant watercourses, aquifers or water reserves that would prevent development (**see Plans 3 and 4**).

The landowners and any development partner would co-operate to provide and meet high environmental standards for water recycling, on-site water treatment and the implementation of sustainable drainage techniques.

It is not anticipated that any development of Beacon Farm would complicate or impinge on the wider sewage, waste water or drainage network.

As indicated through the indicative Ecological Framework Plan (**Plan 15**) it is anticipated that areas of woodland, wetland or other valuable habitats can be created as part of the development. These would be planned in accordance with professional advice of the appropriate environmental and planning authorities. The ecological framework proposals afford an opportunity for the area to be a net store of surface water and offer flood alleviation and mitigation to a wider area and not increased run-off as suggested by the revised SA report addendum.

All Plan references relate to submitted report.

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.

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Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Lufton & Assoc's for Clarke Farms ()
Comment ID	PSS23
Response Date	31/05/13 11:05
Consultation Point	3.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.4

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

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Land at Beacon Farm provides an excellent opportunity for the long-term expansion of Stafford town that could be developed in accordance with the policies and strategy of the National Planning Policy Framework (NPPF) and the Stafford Borough Submission Core Strategy. Ecology, Biodiversity and Habitats Plan extracts 5 and 6 are reproduced from the Stafford Borough Local Plan Proposals Map 2001 and Plan 7 is an extract is reproduced from the current (2013) Defra Magic Geographic Information System. The area at Beacon Farm proposed for development is covered by no significant environmental designations in relation to ecology, biodiversity or habitats. The proposed development area contains no sites of special scientific interest (SSSI's), no designation as a special area of conservation (SAC), no RAMSAR designation (for bird habitat) or any designation national, regional or local as a nature reserve.

As Plan 7 shows the only land-based designation of the area is for nitrate vulnerability that is an issue that impacts on the whole of Stafford Borough.

The woodland at Beacon Hill, adjacent to the proposed development area, is recognised and included in the Inventory of Woodland and Trees administered by English Nature and recorded as deciduous biodiversity action plan priority habitat (**see Plan 8**). As indicated through the indicative Ecological Framework Plan (**Plan 15**) it is anticipated that the development of Beacon Farm would provide enhancement to the established woodland with adjoining complementary planting and/or wetland and habitat creation.

Land adjoining Beacon Farm within the wire of Beacon Barracks also contains some deciduous biodiversity action plan priority habitat (**see Plan 8**) and the landowners, Lufton & Associates as agents and any development partner would co-operate with the MoD in any potential joint development project to assist them in the protection of this asset.

In terms of grassland and lowland habitats the proposed development area contains no priority areas (**See Plan 9**).

The proposed development area is not recognised as an area important for birds (**See Plan 10**).

The landowner is aware of some presence and activity of badgers befitting from the rich habitat provided by the established hedgerows on Beacon Farm. In accordance with protection legislation these areas cannot of course be identified in a public document. These habitats would be fully protected in accordance with the indicative Ecological Framework Plan (**Plan 15**) recognising that badgers while a protected species under their own 1992 Act are also currently subject of a legal extermination programme to control bovine tuberculosis.

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Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Lufton & Assoc's for Clarke Farms ()
Comment ID	PSS24
Response Date	31/05/13 11:09
Consultation Point	3.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.4

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In terms of the sensitivity of the historical landscape character to accommodate change the County Council have assessed the majority of the proposed development area as medium with a small area south-west of Hopton village as high (**see Plan 12**).

None of the higher ground to the north-east of the town is proposed for development. The proposed development area is all lower-lying land under Beacon Hill and a natural ridge line to the north. The landowner and agent working with a future development partner intend to provide a visual impact assessment to support the proposal in due course.

Landfill and Ground Contamination

Land directly to the west of Beacon Farm farmstead has historically been landfilled (**see Plan 13**). Planning records available to Lufton & Associates indicate this is likely to be non-hazardous inert building and commercial waste that would have no impact on the viability of the proposed area for development.

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Comments

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Comment by	Lufton & Assoc's for Clarke Farms ()
Comment ID	PSS25
Response Date	31/05/13 11:15
Consultation Point	3.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.1

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Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Lufton & Assoc's for Clarke Farms ()
Comment ID	PSS26
Response Date	31/05/13 11:19
Consultation Point	3.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.1

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

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Do you consider that the document is Sound? No

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- . Justified

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

Land at Beacon Farm provides an excellent opportunity for the long-term expansion of Stafford town that could be developed in accordance with the policies and strategy of the National Planning Policy Framework (NPPF) and the Stafford Borough Submission Core Strategy.

Mineral Sterilisation Research and assessment undertaken by the British Geological Survey (2006) to assist Staffordshire County Council in identifying Mineral Consultation Areas appears to indicate that if there are any workable mineral resource lying beneath the proposed development area that this would be bedrock sand or near surface superficial sand and gravel.

These minerals in reserve and currently being worked are abundant in the local, Staffordshire and national context with significant extant permitted reserves. It is not anticipated the presence of any mineral resource would be a significant constraint to the development of Beacon Farm.

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Lufton & Assoc's for Clarke Farms ()
Comment ID	PSS27
Response Date	31/05/13 11:25
Consultation Point	3.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.1

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified

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

Land at Beacon Farm provides an excellent opportunity for the long-term expansion of Stafford town that could be developed in accordance with the policies and strategy of the National Planning Policy Framework (NPPF) and the Stafford Borough Submission Core Strategy. Utilities and Services

The work commissioned by the Borough Council to inform infrastructure planning from the consultants Colin Buchanan (Buchanan, LEVVEL, Hewden and Mott McDonald, July 2009) covers the issues of gas, electricity and water supply at a macro town wide scale.

In relation to gas supply the report states;

"Gas supply is generally based on three networks:

- * the high pressure system which transports gas over large distances
- * the medium pressure system which provides gas to specific locations and Settlements.
- * the low pressure system which distributes gas at a local level.

Stafford has a medium pressure ring main which runs around the majority of the town supplying gas to off take stations feeding small low pressure minor networks which service individual properties.

From our discussions with Fulcrum Infrastructure Services none of the locations considered for this study are known to have any requirement for works to the high pressure system. The ring main around Stafford is a medium pressure system, which would be extended to service sites such as SF-h on the northern edge of Stafford without the requirement any works to the high pressure system.

In general, there are no major gas infrastructure works required in Stafford. The gas supply network appears to be robust and has the potential capacity to accommodate all of the proposed developments. As a result, the majority of the proposed sites only require 'standard' connections into the medium pressure system. The costs of these connections would appear as a standard cost for developers."

In relation to electricity supply the report states;

"For any significant development it is likely that a new local substation will be required to service specific locations. The majority of the developments proposed in Stafford town are on the outskirts of the existing urban development and as a result of this and their proposed scale it is likely that they will all require a new local substation. The cost of this (estimated at around 70,000 each) would be expected to be borne by the developer/landowner. Costs of additional infrastructure required to support a development may also require a contribution from the developer.

In order to deliver the proposed scale of housing developments, 11kv network improvements would be required for all of the proposed sites. Across the whole of Stafford, if all of the proposed developments were to come forward these infrastructure improvements would cost in the region of 12 million.

In addition to the 11kv network improvements, if proposed site SF-2 (3,000 units) is developed, a new major substation connected to the 132kv supply network would be required. This could also serve SF-1 (800 units). This infrastructure improvement would have a longer lead time than the local improvements and would cost in the region of 6 million."

In relation to water supply the report states;

"Clean water can be supplied from a number of sources and in Stafford Borough these include boreholes and reservoirs (to the north, south-east, and south-west of Stafford town) as well as a number of groundwater sources. Two out of the three reservoirs (south-east and south-west) are at capacity. However, the network layout does not currently allow optimum use of the capacity available at the northern reservoir at Peasley Bank.

The northern direction of growth could be supported without any further infrastructure improvements. However, the network has been identified as needing re-reinforcement in order to meet the western growth requirements. Further re-reinforcements will be needed if growth in the south and east is to be supported.

Severn Trent Water will not fully fund the provision of infrastructure to support development although an allowance for this infrastructure is included within their business plan. A contribution to the cost of infrastructure from a developer is calculated as a 'commuted sum' which is based on the cost of the infrastructure minus the potential income which the new connections will generate for Severn Trent over a 12 year period.

In general lead times for reinforcement works to the network are in the region of 18 months with a construction period of around 12 months."

The report considers only the Strategic Development Locations favoured by the Borough Council although the findings are as relevant to the proposed allocation of Beacon Farm.

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Lufton & Assoc's for Clarke Farms ()
Comment ID	PSS28
Response Date	31/05/13 11:28
Consultation Point	3.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.1

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Justified
- . Effective
- . Consistent with national policy

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

Ministry of Defence (MoD), the Defence Infrastructure Organisation (DIO) and the Military Facility North-East of Stafford

The MoD land-holdings surround the proposed development area to the north-west, west and south-west. Lufton & Associates have engaged with the DIO since January 2013 being aware that there are significant and far-reaching changes in military organisation planned that could have considerable implications for the MoD presence in the town.

The BORONA programme that involves implementing the closure of Rhine Garrison, Munster Station and Celle Station in Germany and returning military personnel to the UK is well documented. It is understood that this programme is to cover a rapid and vital part of military restructuring and will involve the accommodation of the major units of the 1st Signal Regiment (from Herford) and the 16th Signal Regiment (from Elmpt) in Stafford by 2015. These will join the 22nd Signal Regiment already based in the town.

In March this year the Defence Secretary, Phillip Hammond, made a very clear statement to the House of Commons that all military bases in Germany are to close by 2020. The majority of personnel are programmed to return to the UK by 2016 with the 20th Brigade comprised of over 4,400 troops to be the last presence in Germany being recalled by 2020.

Seven MoD bases including Stafford are mentioned generally as recipient sites. This is part of a significant cost-saving programme in Germany and a 1.8billion investment plan in infrastructure and accommodation by the MoD in the UK and is additional to the BORONA programme with a 2015 timeline.

The landowners and Lufton & Associates are willing to work with the DIO and consider any proposals that would be of mutual benefit. What seems important is that despite issues of operational and site security at Beacon Barracks the DIO actively engages with the relevant parties and authorities to plan the future presence of the MoD in the town. Lufton & Associates considers this should be within rather than outwith the Core Strategy process.

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Lufton & Assoc's for Clarke Farms ()
Comment ID	PSS29
Response Date	31/05/13 11:40
Consultation Point	3.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.1

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not: . Positively prepared

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

Land at Beacon Farm provides an excellent opportunity for the long-term expansion of Stafford town that could be developed in accordance with the policies and strategy of the National Planning Policy Framework (NPPF) and the Stafford Borough Submission Core Strategy. Delivery: Gestation of a Masterplan The landowners and agents Lufton & Associates consider in the view of the Core Strategy process and the detail that the document contains an initial indicative Masterplan for the proposed development area would be helpful. This is shown at a wider scale on page 2, Plan 2 and below (**Plan 14**) focussed on the development area. The Land-Use Masterplan is born from a series of incremental and iterative planning and design stages. It reflects the constraints and site opportunities considered above. In particular the wider regeneration and planned changes within the Borough have been considered, as have transport initiatives and investment, the landscape setting and the topography of the location, the proximity of local communities and their sensitivity to change and pressures on supporting infrastructure.

The indicative Masterplan seeks to integrate development with ecological improvements and enhancement and create a mix of land-uses with the objective of reducing the need for travel and

minimising the generation of vehicular trips. A public park, local centre, a primary school and extensive areas of public open space are integral and central to the design philosophy.

The Destination and Accessibility Plan (*see Plan 16*), the Ecological Framework Plan (*see Plan 15*) and the Access, Transport and Integration Plan (*see Plan 17*) were prepared in advance and informed the Land Use Masterplan.

Principles of Accessibility

Plan 15 graphically represents an initial appraisal of the proposed development area in terms of accessibility to key locations, services and facilities and adjoining areas.

This is an assessment that the landowner and agent working with a future development partner intend to investigate further to support the proposal in due course.

The town centre is less than 2.5km from the centre of the proposed development area when connected using a route across Beacon Barracks via Trenchard Avenue, Tithe Barn Road and Corporation Street. It would of course require a controlled crossing or refuge on Beaconside to complete a viable route. A cycling and walking spine here though would draw together a number of high intensity land-uses including Stafford Hospital, the Beaconside south housing site and the major redevelopment of St. Georges Hospital. On the Access, Transport and Integration Plan (*Plan 16*) the cycling and walking spine is shown as connecting right through Beacon Farm to Hopton and could act as a sustainable transport route integrating the whole north-east quadrant of the town. As shown this would have very significant benefits in improving accessibility by a short branch connection to link to the Staffordshire University campus and the Technology Park.

A short branch cycle and walking route to Dyson Way (*Plan 16*) would also connect the proposed development area and central cycling and walking spine through the Technology Park and University Campus to Weston Road (Academy) High School.

Vehicular Access

Providing adequate access to the proposed development area is acknowledged at present to be the most significant technical constraint.

As indicated on Plan 16 the main access is proposed from Beaconside following the line of the existing track between the Technology Park and Beacon Barracks. This access is not in control of the landowner and will require negotiation to accomplish required highway and junction standards once developer backing has been secured. There appears to be no technical, physical or other impediment to access, the constraint issue it is purely a matter of land ownership and control.

The visibility, the controlled traffic speed, existing junction arrangements and the road safety record of Beaconside all appear favourable to securing an adequate junction arrangement in this location.

An alternative access could be made if there was a more significant redevelopment of Beacon Barracks although it is respected at present this would not be possible for reasons of operational security on the site. Alternative vehicular access might also be made from Weston Road, although clearly in terms of proximity to the urban area, this is not the favoured approach.

The landowner and agent working with a future development partner intend to work on access solutions as a matter of priority to support the proposal through the planning process.

Public Transport Access

Public transport access and service enhancement are a priority and a circulation route for buses is shown on Plan 16. The proposed development would offer opportunities to improve public transport services for north-east Stafford increasing connectivity with the town centre and providing better links for the Technology Park and the University.

Principles of Integration

The indicative Masterplan, Plan 2, and the Access, Transport and Integration Plan, Plan 16, indicate the importance recognised in integrating the proposed development area with the surrounding urban form, activities and communities. Particular attention in detailed design and planning would be given to integrating the proposed housing with the Technology Park extension and with any redevelopment or programmes of the MoD.

In relation to the adjoining MoD detailed design and planning could accommodate the relationship of the land-uses in any number of ways from integration to clear delineation, division and security. It is clear that there is likely to be a future accommodation need for family housing for military personnel whether through provision of market housing or some other form. This development could integrate very well with the new community proposals at Beacon Farm.

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.

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If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Lufton & Assoc's for Clarke Farms ()
Comment ID	PSS30
Response Date	31/05/13 11:47
Consultation Point	3.5 Paragraph (View)
Status	Processed
Submission Type	Web
Version	0.1

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not: . Positively prepared

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

Land at Beacon Farm provides an excellent opportunity for the long-term expansion of Stafford town that could be developed in accordance with the policies and strategy of the National Planning Policy Framework (NPPF) and the Stafford Borough Submission Core Strategy. Utilities and Services The work commissioned by the Borough Council to inform infrastructure planning from the consultants Colin Buchanan (Buchanan, LEVVEL, Hewden and Mott McDonald, July 2009) covers the issues of gas, electricity and water supply at a macro town wide scale.

In relation to gas supply the report states;

"Gas supply is generally based on three networks:

- the high pressure system which transports gas over large distances
- the medium pressure system which provides gas to specific locations and Settlements.
- the low pressure system which distributes gas at a local level.

Stafford has a medium pressure ring main which runs around the majority of the town supplying gas to off take stations feeding small low pressure minor networks which service individual properties.

From our discussions with Fulcrum Infrastructure Services none of the locations considered for this study are known to have any requirement for works to the high pressure system. The ring main around Stafford is a medium pressure system, which would be extended to service sites such as SF-h on the northern edge of Stafford without the requirement any works to the high pressure system.

In general, there are no major gas infrastructure works required in Stafford. The gas supply network appears to be robust and has the potential capacity to accommodate all of the proposed developments. As a result, the majority of the proposed sites only require 'standard' connections into the medium pressure system. The costs of these connections would appear as a standard cost for developers."

In relation to electricity supply the report states;

"For any significant development it is likely that a new local substation will be required to service specific locations. The majority of the developments proposed in Stafford town are on the outskirts of the existing urban development and as a result of this and their proposed scale it is likely that they will all require a new local substation. The cost of this (estimated at around 70,000 each) would be expected to be borne by the developer/landowner. Costs of additional infrastructure required to support a development may also require a contribution from the developer.

In order to deliver the proposed scale of housing developments, 11kv network improvements would be required for all of the proposed sites. Across the whole of Stafford, if all of the proposed developments were to come forward these infrastructure improvements would cost in the region of 12 million.

In addition to the 11kv network improvements, if proposed site SF-2 (3,000 units) is developed, a new major substation connected to the 132kv supply network would be required. This could also serve SF-1 (800 units). This infrastructure improvement would have a longer lead time than the local improvements and would cost in the region of 6 million."

In relation to water supply the report states;

"Clean water can be supplied from a number of sources and in Stafford Borough these include boreholes and reservoirs (to the north, south-east, and south-west of Stafford town) as well as a number of groundwater sources. Two out of the three reservoirs (south-east and south-west) are at capacity. However, the network layout does not currently allow optimum use of the capacity available at the northern reservoir at Peasley Bank.

The northern direction of growth could be supported without any further infrastructure improvements. However, the network has been identified as needing re-reinforcement in order to meet the western growth requirements. Further re-reinforcements will be needed if growth in the south and east is to be supported.

Severn Trent Water will not fully fund the provision of infrastructure to support development although an allowance for this infrastructure is included within their business plan. A contribution to the cost of infrastructure from a developer is calculated as a 'commuted sum' which is based on the cost of the infrastructure minus the potential income which the new connections will generate for Severn Trent over a 12 year period.

In general lead times for reinforcement works to the network are in the region of 18 months with a construction period of around 12 months."

The report considers only the Strategic Development Locations favoured by the Borough Council although the findings are as relevant to the proposed allocation of Beacon Farm.

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.

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If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	MJ Barratt Development ()
Comment ID	PSS31
Response Date	30/05/13 09:49
Consultation Point	4 Stone Town ? Other 'Reasonable' Alternative Location (View)
Status	Processed
Submission Type	Email
Version	0.10
Files	Consultation-response-form MJ Barrett.pdf

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? No

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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)	M J Barrett Group	JVH Town Planning Consultants
Address Line 1	Brookside Business Park	Houndhill Courtyard
Address Line 2	Brookside Road	Houndhill
Address Line 3	Uttoxeter	Marchington
Address Line 4	Staffordshire	Staffordshire
Postcode	ST14 8AT	ST14 8LN
Telephone Number	01889 546295	01283 820040
E-mail address	<input type="text"/>	office@jvhplanning.co.uk

Part B – Please use a separate sheet for each representation

Please note: At this stage of the process, we are gathering representations on the ‘soundness’ of The Plan for Stafford Borough regarding the Addendum to the Revised Sustainability Appraisal Report and Planning Strategy Statement only. **We are not inviting further representations on the Plan for Stafford Borough – Publication**

Name or Organisation	JVH Town Planning Consultants Ltd for M J Barrett Group
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3. What part of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement does your comment relate to?

e.g. Section Reference, Paragraph	Revised Sustainability Appraisal Report Addendum Planning Strategy Statement. 4 Stone Town – Other reasonable Alternative Location. Para 4.5
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If your comment does not relate to a specific part of the document, or it relates to a different document, please make this clear in your response.

4. Do you consider that the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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 Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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 Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement is not legally compliant, or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement , please also use this box to set out your comments.

Revised Sustainability Appraisal Report Addendum

Planning Strategy Statement. 4 Stone Town – Other reasonable Alternative Location.

We consider that the Planning Strategy Statement within the text on page 5, Para 4.1 to 4.5 does not make it clear that a new site at Stone is being tested and considered, this appears to be identified as a black octagon numbered 3 on the Stone Key Diagram. The text in this section is confusing as to the nature of what new matter is being considered and how this is and has been dealt with as part of the process. If this document is to be part of the Plan for Stafford then it needs to be clearer. In any event we do not consider that the locations around Stone have been properly analysed and tested, including the review of the greenbelt in this location. The sustainability appraisal document talking about south west of Stone, which we can only assume is the black octagon on the diagram is so vague as to be meaningless.

This type of retro testing is completely unsound. The plan should have properly tested all the locations around the settlements in the same way and enabled users of the plan to have understood which land is being tested. The whole point of considering alternatives is to allow meaningful comparison at the time before the preferred strategy is set, otherwise how can these alternatives have been properly considered to inform the Preferred Strategy. Several High Court challenges to plans have highlighted this problem and made it clear that this is the crucial stage of the plan. It is completely unsatisfactory to try to attempt to patch up a plan after the strategy is set with this type of flawed analysis. The plan should be found unsound on this basis alone.

As we have previously commented upon in our representation to The Plan for Stafford Borough Pre-Submission Consultation, we consider that further consideration of other more sustainable and deliverable sites is required within Stone to help deliver the plan for Stafford. Namely the inclusion of land between the Trent and Mersey Canal and the north of A34. This land has now been subject to pre application discussions with County Highways in respect to access from the A34 and further work is being undertaken to demonstrate this site is developable.

It is considered that this site can bring homes forward early within the plan period and help overcome the current shortfall in respect to the understood shortfall of the 5-year housing supply. This land is not subject to flooding constraints and has good access to the Town Centre, being less than half the distance of the Alternative proposed location. In addition, this site does not impact upon the landscape in the same way as land to the West of Stone by virtue of its location between the A34 and the Trent and Mersey Canal.

The Site is sustainable and located within 1km of the station and employment opportunities, which are located between the site and the Town Centre.

Although located within the Green Belt this site is not considered to be subject to any overriding constraint that should preclude its development. Due to the location of the site, development will not result in the coalescence of settlements. As the site is contained by the A34 and the Trent and Mersey Canal, for this reason the removal of this site from the Greenbelt and its future

development will not undermine the main principals of the Greenbelt.

In respect to the Alternative location, this is not considered to represent as a sustainable development alternative to the land adjacent to the A34 and as highlighted with the Planning Strategy Statement and Revised Sustainability Appraisal Report Addendum the other 'Reasonable Location is subject to a number of short comings, in respect to sustainability including public transport and landscape impacts.

Para 4.5

We object and raise a question as to the detail undertaken in respect to the consideration of alternative sites within this Para as this states that:

“A number of alternative strategic locations around Stone have also been considered during the Plan making Process. Significant development along the River Trent and the Trent and Mersey Canal corridor has been discounted due to flooding constraints.”

The land we consider that should be included is adjacent to the Trent and Mersey Canal, but is not considered to be at risk of flooding and therefore concern is raised as to this reliability and detail of the work undertaken in this regard and as to the extend of the other sites considered.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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.**

Consideration of the Land between the A34 and the Trent and Mersey Canal to the North West of Stone should be considered as an available development location with the potential to deliver around 100 new homes with an owner/developer keen to progress 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

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Walton Homes
Comment ID	PSS32
Response Date	30/05/13 09:55
Consultation Point	4 Stone Town ? Other 'Reasonable' Alternative Location (View)
Status	Processed
Submission Type	Email
Version	0.8
Files	Consultation-response-form Walton Homes.pdf

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? No

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
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If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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)	Walton Homes Ltd	JVH Town Planning Consultants
Address Line 1	Charter House	Houndhill Courtyard
Address Line 2	Sandford Street	Houndhill
Address Line 3	Lichfield	Marchington
Address Line 4	Staffordshire	Staffordshire
Postcode	WS13 6AQ	ST14 8LN
Telephone Number	01543 412288	01283 820040
E-mail address	<input type="text"/>	office@jvhplanning.co.uk

Part B – Please use a separate sheet for each representation

Please note: At this stage of the process, we are gathering representations on the ‘soundness’ of The Plan for Stafford Borough regarding the Addendum to the Revised Sustainability Appraisal Report and Planning Strategy Statement only. **We are not inviting further representations on the Plan for Stafford Borough – Publication**

Name or Organisation	JVH Town Planning Consultants Ltd for Walton Homes Ltd
----------------------	--

3. What part of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement does your comment relate to?

e.g. Section Reference, Paragraph	Revised Sustainability Appraisal Report Addendum Planning Strategy Statement.
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If your comment does not relate to a specific part of the document, or it relates to a different document, please make this clear in your response.

4. Do you consider that the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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 Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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 Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement is not legally compliant, or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement , please also use this box to set out your comments.

**Revised Sustainability Appraisal Report Addendum
Planning Strategy Statement. 4 Stone Town – Other reasonable Alternative Location.**

We consider that the Planning Strategy Statement and Revised Sustainability Appraisal Addendum are unclear and highlight significant flaws in the plan production process in the plan for Stafford Borough. In addition to consideration of new site in Stafford it is also unclear as to if a new site at Stone is also being tested and considered, this appears to be identified as a black octagon numbered 3 on the Stone Key Diagram. The text in this section is confusing as to the nature of what new matter is being considered and how this is and has been dealt with as part of the process.

If this document is to be part of the Plan for Stafford then it needs to be clearer. In any event we do not consider that the locations around Stafford and Stone and the wider Borough such as at Hixon have been properly analysed and tested, including reviewing the greenbelt. The sustainability appraisal document is talking about south west of Stone, which we can only assume is the black octagon on the diagram, which is so vague as to be meaningless.

This type of retro testing is completely unsound. The plan should have been properly tested in all the locations around the settlements in the same way and enabled users of the plan to have understood which land is being tested. The whole point of considering alternatives is to allow meaningful comparison at the time before the preferred strategy is set, otherwise how can these alternatives have been properly considered to inform the Preferred Strategy. Several High Court challenges to plans have highlighted this problem and made it clear that this is the crucial stage of the plan. It is completely unsatisfactory to try to attempt to patch up a plan after the strategy is set with this type of flawed analysis. The plan should be found unsound on this basis alone.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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

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

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Hallam Land Management and Davidsons ()
Comment ID	PSS33
Response Date	30/05/13 14:58
Consultation Point	4 Stone Town ? Other 'Reasonable' Alternative Location (View)
Status	Processed
Submission Type	Email
Version	0.5
Files	Hallam Land response-form.pdf

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

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 Inspectorate, based on the matter and issues he / she identifies for examination

If your representation is seeking a change, do you consider it necessary to participate at the Examination in Public? Yes, I wish to participate at the examination in public

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"/>	Mr
First Name	<input type="text"/>	Stephen
Last Name	<input type="text"/>	Stoney
Job Title (if applicable)	<input type="text"/>	Technical Director
Organisation (if applicable)	Hallam Land Management Limited and The Davidsons Group	Wardell Armstrong LLP
Address Line 1	<input type="text"/>	Sir Henry Doulton House
Address Line 2	<input type="text"/>	Forge Lane
Address Line 3	<input type="text"/>	Etruria
Address Line 4	<input type="text"/>	Stoke-on-Trent
Postcode	<input type="text"/>	ST1 5BD
Telephone Number	<input type="text"/>	01782 276700
E-mail address	<input type="text"/>	smstoney@wardell-armstrong.com

Part B – Please use a separate sheet for each representation

Please note: At this stage of the process, we are gathering representations on the ‘soundness’ of The Plan for Stafford Borough regarding the Addendum to the Revised Sustainability Appraisal Report and Planning Strategy Statement only. **We are not inviting further representations on the Plan for Stafford Borough – Publication**

Name or Organisation	Wardell Armstrong LLP on behalf of Hallam Land Management Limited and The Davidsons Group
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3. What part of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement does your comment relate to?

e.g. Section Reference, Paragraph	Planning Strategy Statement – 4 Stone Town – Other ‘reasonable’ alternative location
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If your comment does not relate to a specific part of the document, or it relates to a different document, please make this clear in your response.

4. Do you consider that the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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 Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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 Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement is not legally compliant, or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement , please also use this box to set out your comments.

The Development Partners unequivocally support the promotion of the site identified in the Plan's Policy Stone 2 - West & South of Stone 'for the delivery of approximately 500 homes'. It respects the key requirements set out with the Policy, conforming to the requirements of the NPPF in terms of the appropriate recognition of a sustainable development site without any major considerations of acknowledged importance that cannot be mitigated against.

The SA Addendum and supporting PSS appropriately re-enforces what is a now long standing proposition through relevant draft Plan iterations, that the Walton Hill site is the appropriate site for delivery of strategic housing delivery within the town of Stone.

This is now reflected in the Key Diagram forming part of the Planning Strategy Statement: Stone Town. The Development Partners' site is appropriately denoted as 'H' Proposed Strategic Site.

With reference to the Plan's identification of Strategic Development location Housing (P.71) and the Stone Concept Diagram (P.72), there has been past submission of illustrative material to support the proposition that the most effective delivery site is that shown on the proposed Masterplan. This is in fact in accordance with the Stone Town Key Diagram (P.66).

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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

Please could I be notified of whether it is intended to and when the Plan has been submitted to the Secretary of State for Independent Examination

(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

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Akzo Nobel UK Ltd c/o Jones Lang LaSalle (Mr Frazer Sandwith)
Comment ID	PSS34
Response Date	31/05/13 10:21
Consultation Point	2 Sustainability Appraisal (View)
Status	Processed
Submission Type	Email
Version	0.6
Files	Akzo Nobel Consultation Response Form.pdf Azko Nobel Cover Letter.pdf

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? Yes

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

One Piccadilly Gardens Manchester M1 1RG
tel +44 (0)161 828 6440 fax +44 (0)161 828 6490

www.joneslanglasalle.co.uk

Head of Planning and Regeneration
Stafford Borough Council
Civic Centre
Riverside
Stafford
ST16 3AQ

Planning Strategy
Document and Revised
Sustainability Appraisal
Report Addendum
Your ref Representations
Akzo Nobel UK Ltd /
Our ref North Stafford
Direct line 0161 238 6295
Frazer.Sandwith@eu.jll.com

30 May 2013

Dear Sir/Madam

**PLANNING STRATEGY STATEMENT AND REVISED SUSTAINABILITY
APPRAISAL REPORT ADDENDUM**

Jones Lang LaSalle welcomes the opportunity to comment on the Planning Strategy Statement and Revised Sustainability Appraisal Report Addendum in the context of the Publication version of The Plan for Stafford Borough Council. We are acting on behalf of Akzo Nobel UK Limited and have previously made representations to the Publication document in February 2013.

Jones Lang LaSalle has reviewed the documents and notes the conclusions made about the Stafford Town – Other ‘Reasonable’ Alternative Locations. Jones Lang LaSalle agrees with the view outlined in the documents that the alternative locations are not considered sustainable when compared to the three proposed Strategic Development Locations already identified.

Furthermore, the documents and their conclusions do not change Jones Lang LaSalle’s position in relation to the previous representations made with regards to the Publication version of The Plan for Stafford Borough Council in February 2013 which stated that it is our view that the most sustainable and deliverable direction of growth in Stafford Town is on the northern side.

Thank you for continuing to keep Jones Lang LaSalle informed of the progress of the Local Plan.



Frazer Sandwith

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
First Name		Frazer
Last Name		Sandwith
Job Title (if applicable)		Associate Director
Organisation (if applicable)	Akzo Nobel UK Limited	Jones Lang LaSalle
Address Line 1		One
Address Line 2		Piccadilly Gardens
Address Line 3		Manchester
Address Line 4		
Postcode		M1 1RG
Telephone		0161 238 6295

Number

E-mail address

Frazer.Sandwith@eu.jll.com

Part B – Please use a separate sheet for each representation

Please note: At this stage of the process, we are gathering representations on the 'soundness' of The Plan for Stafford Borough regarding the Addendum to the Revised Sustainability Appraisal Report and Planning Strategy Statement only. **We are not inviting further representations on the Plan for Stafford Borough – Publication**

Name or Organisation	Akzo Nobel UK Ltd
----------------------	-------------------

3. What part of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement does your comment relate to?

e.g. Section Reference, Paragraph	Planning Strategy Statement – Section 2 – Stafford Town – Other 'Reasonable' Alternative Locations Revised Sustainability Appraisal Report Addendum – Section 2 – Sustainability Appraisal of Clarkes Farm, Stafford Revised Sustainability Appraisal Report Addendum – Section 3 – Sustainability Appraisal of sites west of M6 Revised Sustainability Appraisal Report Addendum – Section 5 – The Findings Revised Sustainability Appraisal Report Addendum – Section 6 – Comparison to Other Directions of Growth
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If your comment does not relate to a specific part of the document, or it relates to a different document, please make this clear in your response.

4. Do you consider that the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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 Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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 Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement is not legally compliant, or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement , please also use this box to set out your comments.

It is our view that the most sustainable and deliverable direction of growth in Stafford Town is on the northern side and we therefore agree with the conclusions set out in the Planning Strategy Statement and the Revised Sustainability Appraisal Report Addendum that state that Clarkes Farm, Stafford and areas north west and south west of M6 are not considered appropriate for development compared to the three proposed Strategic Development Locations already identified.

We agree that the Clarkes Farm area is inappropriate for development, and certainly as a reasonable alternative to the three Strategic Development Locations for Stafford, given the number of sustainability concerns raised in the Revised Sustainability Appraisal Report Addendum and in particular relating to biodiversity, landscape, relationship to the town in terms of character, movement and access, and surface run off implications.

We also agree that development west of the M6 (north west and south west) is inappropriate for development, and certainly as a reasonable alternative to the three Strategic Development Locations for Stafford, given the many uncertain and negative impacts outlined in the Revised Sustainability Appraisal Report Addendum and in particular in relation to landscape, impact on the rural character of the area and existing settlements, and increasing need to travel by car to access employment, services and facilities.

We consider it better to focus a greater proportion of the overall growth of Stafford Town on

Akzo Nobel UK Ltd's land given our view that the most sustainable and deliverable direction of growth in Stafford Town is on the northern side. We therefore request that greater emphasis is placed upon this in The Plan for Stafford Borough in order to achieve the supply of new homes.

7. Please set out what change(s) you consider necessary to make the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Dr Malcolm Bell Ltd (Dr Malcolm Bell)
Comment ID	PSS35
Response Date	03/06/13 10:46
Consultation Point	4 Stone Town ? Other 'Reasonable' Alternative Location (View)
Status	Processed
Submission Type	Letter
Version	0.6
Files	Bowers 13 05 30lettertoAYendole as sent.pdf

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

MB/GAJ

30 May 2013

Mr Alex Yendole
Forward Planning Manager
Planning and Regeneration
Stafford Borough Council
Civic Centre
Riverside
STAFFORD
ST16 3AQ

Dear Mr Yendole

Re: formal representation on additional core directions and sustainability appraisal consultation on behalf of the Bowers family: re the allocation of further retail provision at Stone to the well-known Bowers site (or an alternative allocation of this land within the formal Plan)

1 Officers know the position and history as well or better than anyone so nothing is gained by undue repetition. Thus, this representation on the present consultation is primarily to emphasise that this additional evidence-base **points strongly to the allocation of the Bowers' land formally within the pages of the Plan, and on the Proposals map rather than leaving it white.** I focus below on the principal immediate issue of a retail allocation but all the Bowers land identified to the council should be allocated in a fully sound Plan given its sustainable location. This might be as industrial, retail or green infrastructure to be brought forward as part of an integrated planning package on different parcels.

2 Let us focus then on the potential retail site. Further dealings since the representations were made on the (unsoundness of) the Plan Strategy point to the need for further retail provision. We appear to have, with respect, the antithesis of a plan led system at the moment. What seems to be coming across to the objective outside professional is that the Authority corporately knows that our site is available and sustainable, knows the provision is needed but may have fancied steering retail provision towards its own land; but is running into well-founded public opposition to that. On the face of it- and these Caesar's wife principles are important to good planning -the Council did not want to stir up further opposition by actually putting on a published Plan that it was considering letting its own land go for retail purposes so it could be objected to formally.

Please reply to: MB PLANNING AND PROWS LTD, Rural Planning & Rights of Way Consultant, 1 Greenview, Lysways Lane, Longdon Green, Nr Rugeley, Staffordshire, WS15 4PY
Mobile: 07977 041979. Email: planning@phoenixrow.co.uk

3 Additionally, not making a formal allocation anywhere in the Plan to date leaves the system open to the accusation that there is no formal allocation so that the Authority has maximum flexibility in manipulating the degree of development contribution etc. Avoiding an allocation can be seen – rightly or wrongly – as a way of setting up a bidding war. Indeed, it appears that there are three options for this needed facility which would have been sound in principle if led by an allocation. One is the Council’s own land which is seen by the public as an important part of the town’s infrastructure and not to be released. Secondly, we have land referred to as the ‘Fire Station Site’ which has had some active promotion but has a number of planning difficulties. Thirdly, we have the Bowers’ site which appears appropriate. That appropriateness is reinforced by these documents on which we are commenting formally. As it is argued therein that the broad south-western location, and indeed a site some metres from the Bowers’ land, is the sustainable direction for growth then it reinforces the sustainability advantages of their site or sites.

4 We add to the objective evidential matrix what has been said to the Bowers by the development company specialising in retail matters who have been showing active interest on behalf of a specific operator for some time. They have recently re-confirmed, following a full review of the size and type calculations by the preferred operator, that the Bowers’ site is the preferable of the three. It is understood that they are to hold a meeting with officers in the very near future with a view to understanding precisely what should accompany an application. This writer is grateful to officers for the steer, in conversation following the formal representations on the overall Plan, that it looks like the retail decision might be taken on the basis of competing applications (or even first come, first served). They would be judged against NPPF and the weight accordable to the emerging Plan Strategy. We understand that within that approach the considerable advantages to the town which could arise from the Bowers’ control of part of the defined green infrastructure would be taken into account were it important to swing the balance. It may prove pragmatic that an application is the realistic way forward. However, open explicit planning – in this professional’s respectful view - is to be preferred to anything which appears to smack of backstage manoeuvring and old fashioned smoky rooms. The sustainability appraisal indicates the Bowers’ site fits the sustainability push to the south-west and we respectfully suggest that for a range of reasons it should be at least earmarked as soon as possible; not least so that finance in a difficult market can be directed toward bringing forward the best site and having some money left over for planning gain where justified. Competing sites- in a not fully choate framework -can lead to considerable waste of resources. It is one reason why we plan.

Yours sincerely

Dr Malcolm Bell MA, MRTPI, FRAgS, MIEnvS, AIAgMgt

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Taylor Wimpey/Bellway ()
Comment ID	PSS36
Response Date	31/05/13 11:54
Consultation Point	Planning Strategy Statement (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Savills on behalf of Taylor Wimpey and Bellway.pdf

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

31 May 2013
CAPL/194314/A3/CC/MW



Alex Yendole
Planning Policy Manager
Stafford Borough Council

By email:
ayendole@staffordbc.gov.uk

Colin Campbell BSc Dip TP MRTPI
E: ccampbell@savills.com
DL: +44 (0) 1223 347068
F: +44 (0) 1223 347111

Unex House
132-134 Hills Road
Cambridge CB2 8PA
T: +44 (0) 1223 347 000
savills.com

Dear Alex

Planning Strategy Statement and Addendum SA

We write on behalf of Taylor Wimpey and Bellway in relation to the consultation on the Planning Strategy Statement and the Addendum SA.

We support the Council's position in relation to the Plan for Stafford Borough and its identification of growth to the west. That position is based on extensive consultation over recent years and an evidence base which has considered the infrastructure needs to support the western direction of growth. Whilst detailed assessments have been undertaken of the infrastructure required to support the current strategic growth locations, it is unclear what infrastructure would be required to support growth to the north east.

In terms of the Addendum SA, the text at para. 2.1 misquotes the requirements of the SEA Directive. The Directive requires that in preparing plans "reasonable alternatives" are assessed, rather than "all" reasonable alternatives. The Council has been preparing the plan over a number of years and has considered reasonable alternatives and therefore we consider there is no need to appraise options which arise late in the plan-making process.

In any event, we do not consider land at Clarke's Farm to be a reasonable alternative to Stafford West because:

- it can not deliver the level of development which can be delivered at Stafford West;
- it is not as well-related to the town centre and railway station;
- it is not as well-related to sustainable transport options;
- it has not been assessed for its impacts on infrastructure and therefore the infrastructure required to support sustainable growth is unknown;
- its location, beyond MOD Stafford means it is divorced from the urban area and unlikely to integrate with existing communities and will effectively function as a free-standing development.

We agree we with the overall conclusions of the Addendum SA that Clarke's Farm is a less sustainable location than Stafford West SDL. We consider that the SA underplays the potential impact of Clarke's Farm in terms of landscape impact, access by sustainable modes and integration with the town and existing communities.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 20 Grosvenor Hill, London W1K 3HQ



The area to the north east of Stafford is an area of attractive, open, rolling agricultural landscape. Development here would have a greater impact on open countryside and attractive natural landscapes than development between the existing western edge of Stafford and the M6.

Clarke's Farm is isolated from the existing town and communities by MOD Stafford, Staffordshire University and the Stafford Technology Park/Beacon Business Park. As such, any development here is unlikely to function as part of the town of Stafford and will not integrate within existing communities. It will form a separate, standalone development.

Criterion 7 assesses public transport accessibility, and the commentary also refers to walking and cycle access to the town centre. We consider that the walking and cycling times to the town centre are an underestimate of the likely journey times, particularly on foot. In terms of accessibility, consideration also needs to be given to the quality of routes. Access to the town centre from Clarke's Farm is via the busy A518 Weston Road, which is likely to deter both cycling and walking as significant modes. In contrast, access to the town centre from the western SDL can be gained via more suitable routes and with shorter journey times.

Development at Clarke's Farm is unlikely to integrate with the town, does not offer the ability to build communities and is unlikely to support the town centre.

Given our clients interests in the western direction of growth and that we have been working in partnership with Stafford BC, Staffordshire CC and other stakeholders to deliver the western Strategic Development Location over a number of years, we would wish to attend the Examination in relation to any discussions which relate to Clarke's Farm as alternative to Stafford West.

Yours sincerely

A handwritten signature in black ink, appearing to read "Colin Campbell". The signature is written in a cursive style and is positioned above a faint, light-colored rectangular stamp or watermark.

**Colin Campbell BSc Dip TP MRTPI
Director**

Comments

Planning Strategy Statement (19/04/13 to 31/05/13)

Comment by	Castle Homes and Properties Ltd ()
Comment ID	PSS37
Response Date	30/05/13 11:21
Consultation Point	Planning Strategy Statement (View)
Status	Processed
Submission Type	Email
Version	0.4
Files	Castle Homes Properties - Consultation response form.pdf

Please refer to the guidance notes on making representations so that they address issues of legal compliance and / or soundness.

Do you consider that the document is Legally compliant? Yes

Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Do you consider that the document is Sound? No

If you have entered no to either of the previous questions please answer question below.

Do you consider the document is unsound because it is not:

- . Positively prepared
- . Justified
- . Effective
- . Consistent with national policy

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	Castle Homes & Properties Limited	Mr
First Name		Frank
Last Name		Hayes
Job Title (if applicable)		Associate Director
Organisation (if applicable)		Wardell-Armstrong
Address Line 1		Sir Henry Doulton House
Address Line 2		Forge Lane,
Address Line 3		Etruria
Address Line 4		Stoke on Trent
Postcode		ST1 5BD
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Part B – Please use a separate sheet for each representation

Please note: At this stage of the process, we are gathering representations on the ‘soundness’ of The Plan for Stafford Borough regarding the Addendum to the Revised Sustainability Appraisal Report and Planning Strategy Statement only. **We are not inviting further representations on the Plan for Stafford Borough – Publication**

Name or Organisation	Castle Homes & Properties Limited
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3. What part of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement does your comment relate to?

e.g. Section Reference, Paragraph	
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If your comment does not relate to a specific part of the document, or it relates to a different document, please make this clear in your response.

4. Do you consider that the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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 Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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 Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement is not legally compliant, or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement , please also use this box to set out your comments.

Submission made on behalf of Castle Homes & Properties Ltd – Land Owner in Stone – Land at Walton Heath (SHLAA site reference 44)

The NPPF (para. 182) sets out test of soundness that a local plan should be considered against. The test include that plans should be;

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

What follows is a review of the Sustainability Appraisal and the Plan for Stafford Borough. The review focuses on options for housing growth and the distribution of housing growth within the borough. Other policy areas are not considered as part of this representation but future representations may be provided on other policies as part of the future Examination In Public.

Is the Plan Positively Prepared and Justified?

Clearly, the emerging plans should be based on a robust and credible evidence base and the choices in the plan should be backed up by fact. The plan should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal.

As commented previously, the proposed target of 500 dwelling per year is insufficient to meet identified housing need within the Borough. The proposed target is below with the 2008 based sub-national household projections. It is also below with the housing requirements outlined in the Phase II revision of the West Midlands Regional Spatial Strategy which indicated a requirement of at least 550 dwellings per year. The policy approach is therefore an attempt to constrain housing development rather than encourage it.

It is noted that the purpose of the Stafford Borough Planning Strategy Statement and the supporting sustainability appraisal focuses exclusively on what is considered 'Reasonable' Alternative Locations for growth in Stafford and Stone. However, 'Reasonable' Alternatives to the distribution of housing growth between the different settlements has not been adequately tested and this is a highly significant planning decision of the emerging plan a major part of its spatial strategy. In particular, Spatial Principle 4 (SP4) – Stafford Borough Housing Growth Distribution proposes the following annual targets for the distribution of housing development;

- *Stafford 72%*
- *Stone 8%*
- *Key Service Villages 12% (Eccleshall, Gnosall, Haughton, Hixon, Great Haywood, Little Haywood and Colwich)*
- *Rest of Rural Area 8%*

It is evident from the previous sustainability appraisals and planning documents that other reasonable alternatives to this proposed distribution have not been properly tested. While 6 broad development

strategy options were assessed these were simply high level strategic approaches rather than reasonable policy alternatives to that outlined in policy (SP4) that are founded in a clear evidence base.

Paragraph 6.39 of *The Plan for Stafford Borough Publication [Pre-Submission]* indicates that the rationale behind the policy seeks to “ensure that the right proposition of development is directed to the most appropriate settlements with access to sufficient services and facilities to support development”. Paragraph 6.45 indicates that the new “Plan for Stafford Borough is proposing to ensure that the distribution of development is delivered to reflect the level of services and facilities available through the Sustainable Settlement Hierarchy. However, the planning policy choice above (SP4) is not backed up by fact and a credible robust evidence base and does not respond to the principles above. Both the Stafford Borough Planning Strategy Statement and the supporting sustainability appraisal does not address this gap in the plan preparation.

Housing and Population Growth

Paragraph 6.24 of *The Plan for Stafford Borough Publication [Pre-Submission]* correctly indicates that Stone is the second most sustainable settlement within the Borough. However, it goes on to state that Stone has “experienced significant housing development in recent years”.

The Stafford Borough Strategic Housing Market Assessment (2012) (SHMA) examines recent profile of newbuild dwellings across the Borough. Over the three year period between 2010 to 2012 a total of 825 dwellings were completed within Stafford Borough. What is evident is that the majority of housing growth in the borough has occurred outside the towns Stafford and Stone. In particular, limited housing growth has occurred in Stone. Therefore the evidence indicates that housing growth within Stone has been restricted in recent years. Overall, a dispersed housing development patterns has continued to occur within the borough.

Table 1: Housing Growth in Stafford Borough

	Housing Growth 2010-2012 (a)
Stafford	42.5%
Stone	14.2%
Other Areas	43.2%

(Sources: (a) Stafford Borough 2012 Strategic Housing Market Assessment – Page 40)

While Stone remains the second largest settlement within the borough population growth within the town between 2001 and 2011 has been more limited.

Table 2: Housing Growth in Stafford Borough

	2001 Population (a)		2011 Population (b)		Population Increase 2001-2011
Stafford	60,493	50%	65,716	50%	5,223
Stone	14,555	12%	16,385	13%	1,830
Other Areas	45,622	38%	48,768	37%	3,146
Total	120,670	100%	130,869	100%	10,199

(Sources: (a) Census 2001 and (b) Census 2011)

Settlements and Services

A Revised Settlement and Assessment of Services and Facilities was carried out in June 2012. The assessment did not collect information for Stafford and Stone but simply focused on smaller settlements. The table below focuses on the five basic services for each settlement. What is demonstrated is that Stone, behind Stafford, can be considered the second most sustainable settlement within the borough with a concentration of primary and secondary schools, medical facilities and retail provision. Both Stafford and Stone provide the only railway stations within the borough.

Table 3: Services in Settlements

	Medical Facility	Educational Facility	Retail Net Floorspace (sqm)	Railway Station
Stafford	20 (a)	31 (a)	19,055 (b)	1 (a)
Stone	6 (a)	9 (a)	4,118 (b)	1 (a)
Key Service Villages (d) 11 villages	7(c)	12 (c)	5,993 (b)	0 (a)
Rest of Rural Area	2 (c)	19 (c)		0 (a)

The policy approach (SP4) is unsound as it would promote unsustainable dispersed development. Stafford and Stone are the two major settlements within the Borough. Stone is the second most sustainable settlement within the Borough.

The current proposed distribution of housing growth within these different areas would see housing provision prioritised in other less sustainable locations such as Key Service Villages and in Rural Areas (20%) over and above that specified for Stone (8%). The proposed policy should seek to prioritise more sustainable locations such as Stone where housing market conditions can assist housing development delivery and where strong environmental constraints are not evident to the south and west of the town. Therefore an opportunity to promote positive change within Stone is not being effectively and reasonably pursued.

Overall, realistic alternatives to housing distribution have not been considered and therefore there is no clear audit trail showing how and why the preferred distribution and scale of growth above was arrived at. Options for a higher distribution and level of housing growth at Stone should be subject to a sustainability appraisal prior to an Examination in Public.

Is the Plan Consistent with National Policy?

The NPPF now calls for the planning system to do everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. The NPPF seeks to boost significantly housing supply ensuring local authorities meet the full, objectively assessed needs for market and affordable housing. The NPPF refers to the need to ensure that 'sufficient land of the right type is available in the right places and at the right time'. Finally, the NPPF requires the maintenance of a 5 year land supply in the form of specific, deliverable sites, with an additional 5% buffer in all cases, raised to 20% in instances of past poor performance, in order to 'provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land'.

Is the Plan Effective?

For a plan to be effective it needs to be both deliverable, provide flexibility and have delivery partners which are signed up to it.

Housing Land Supply and Flexibility

The Plan for Stafford Borough Publication [Pre-Submission] Policy Stone 1 – Stone Town indicates that new housing development at Stone should be delivered after 2021.

As indicated by a recent Planning Appeal Decision (APP/Y3425/A/12/2172968) Stafford Borough cannot demonstrate a full 5 year supply of deliverable sites. Also emphasised within that appeal decision is the fact that there has been a continued shortfall of housing provision within the Borough over a considerable period of time. This accumulated shortfall is also not recognised within the proposed policy. The Inspector as part of Inquiry has made it clear that this housing shortfall should be met sooner rather than later.

"Using these figures would give a requirement of 550 dwellings per year. In the 6 years since 2006, an accumulated shortfall would have been created of some 914 dwellings. To be consistent with Planning for Growth and paragraph 47 of the Framework, I consider that it would not be reasonable to ignore any shortfall already created.

Also it would be preferable to meet the shortfall sooner rather than later, by adding it to the 5 year requirement, giving a 5 year requirement of 3664. The Council has not demonstrated that this could be achieved, even if their supply figures were adopted, over which there is some question as to their robustness, and therefore even without the addition of buffers, the Council does not have a five year land

supply.”

Overall, therefore there been continued and persistent under delivery of housing within the Borough. At present, the plan does not propose any substantive housing delivery for Stone until after 2021. The policy would not enable earlier development of sites at Stone despite the urgent local need, and past poor performance in the Borough. It is therefore essential that changes are made to this policy position to make it clear that planning applications on approved sites can be brought forward without conflict to policy relating to housing delivery.

Housing Market Conditions

The SHMA examines the difference in house prices (see map below) throughout the Borough. What is evident is that lower houses prices are evident within Stafford Town with higher house prices existing within Stone Town and wider rural areas. While this is just one indicator of housing market demand, it does suggest that Stafford Town has a more challenging housing market than Stone Town or other rural locations.

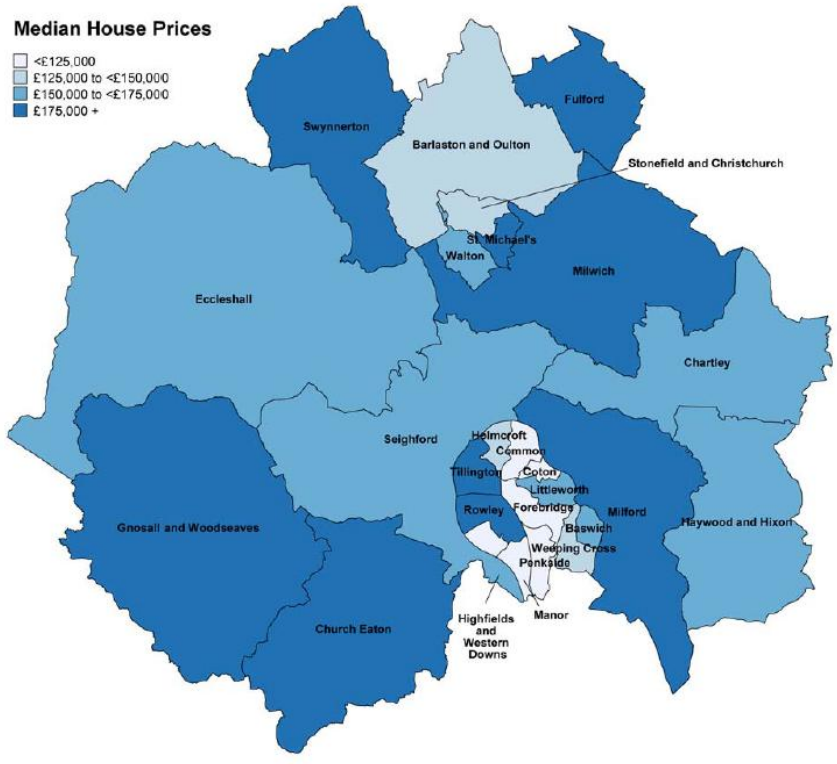
Paragraph 6.24 of *The Plan for Stafford Borough Publication [Pre-Submission]* indicates that “major development at Stone could have implications for the North Staffordshire urban regeneration initiatives and therefore it will be necessary both to constrain the overall quantity of new development, and to phase it until after 2021”.

The SHMA recognises that “Stafford Borough is part of a broader functional market which extends sub-regionally and particularly into Stoke on Trent”. However there is no reference in the SHMA to any negative relationship between housing development within Stone and its impact on North Staffordshire urban regeneration initiative.

Furthermore, the SHMA does provide a breakdown of the workplaces of Stafford residents by ward area. Using this data, (See Table 4) what is evident is that there is a higher percentage of residents living in Northern Rural Wards which commute to Stoke-On-Trent than Stone Town Wards. In addition, Stone Town Wards have a much higher level of self containment than Northern Rural Wards in that a high percentage of people that live in Stone work in Stone. In consideration of the above it is unlikely that additional housing growth above that currently proposed for Stone would undermine the North Staffordshire urban regeneration initiative.

It is also significant to note that three Key Service Villages Barlaston, Tittensor and Yarnfield are located within Northern Rural Wards.

Map 3.1 Stafford Borough median house prices by ward Feb 12 to May 12



Source: Land Registry Feb 2012 to May 2012

This data covers the transactions received at land Registry in the period 1 Feb 12 the month to 25 May 2012 © Crown copyright 2012."

Table 4: Workplace of Stafford residents by ward

Residence	Workplace (Row %)		
	Stafford	Stoke-on-Trent	Newcastle-under-Lyme
Northern Rural Wards			
Fulford	35.8	41.1	4.8
Barlaston and Oulton	51.3	31.1	5.9
Swynnerton	48.0	25.3	9.9
Stone Town Wards			
Stonefield and Chirstchurch	67.7	13.5	3.7
St Michael's	60.0	15.5	5.3
Walton	74.6	11.3	3.9
Stafford Borough	68.2	8.5	2.3

(Sources: (a) Stafford Borough 2012 Strategic Housing Market Assessment – Page 31 / Census 2001)

Paragraph 4.3 of *The Plan for Stafford Borough Planning Strategy Statement* correctly indicates that following “an assessment of infrastructure and environmental constraints, new development to the south and west (of Stone) were identified as deliverable in planning terms for large-scale new development. On that basis we would recommend that SHLAA site reference 44 is included within the plan as a residential development opportunity. This will provide flexibility within the plan and ensure delivery of housing growth within a sustainable settlement.

(attach separate sheets as necessary)

- 7. Please set out what change(s) you consider necessary to make the Addendum to the Revised Sustainability Appraisal Report and / or the Planning Strategy Statement 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.**

Consideration of ‘Reasonable’ Alternatives

Overall, realistic alternatives to housing distribution and housing growth have not been considered and therefore there is no clear audit trail showing how and why the preferred distribution outlined in SP4 was arrived at. Options for a higher distribution and level of housing growth at Stone should be subject to a sustainability appraisal prior to an Examination in Public.

Policy SP2

Revise the housing growth figures in line with the guidance of the NPPF, Planning for Growth and previous housing market trends within the borough.

Policy SP4

Put simply, policy should seek to increase level and proportion of housing growth assigned to Stone in the interest of sustainable development, identified housing need, deliverability and plan flexibility.

Policy Stone 2 – West & South of Stone

Increase the proportion of housing growth assigned to Stone over and above 500 additional dwellings. Provide flexibility within the policy by specifying that additional housing growth over and above the agreed dwelling requirement would be encourage in Stone, particularly to the West of the Settlement.

We would recommend that SHLAA site reference 44 is included within the plan as a residential development opportunity. This will provide flexibility within the plan and ensure delivery of housing growth within a sustainable settlement.

(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 present the representation in an open and transparent manner for the Inspector’s proper consideration.

Please could I be notified of whether it is intended to and when the Plan has been submitted to the Secretary of State for Independent Examination.

(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